

Inspection Report Tracking ID:127-0002I

Source: Tucson Iron & Metal **Location:** 4484 E Tennessee St

Date: June 3, 2020 Arrival Time: 9:20 Departure Time: 2:15pm

Inspectors: Timothy Gentry, Joanne Sufi

Spoke With: Caitlin Goldsmith, Dan Butwinski

Phone #:

Reason for Inspection: Full Compliance Evaluation

Source Description and Compliance History

Tucson Iron and Metal (TI&M) was issued a Pima County Department of Environmental Quality (PDEQ) Class I, Title V, five year permit No. 127, for operation of the 4484 E Tennessee Street facility. TI&M was issued the permit to operate an Aluminum Sweat Furnace under 40 CFR 63, Subpart RRR, National Emissions Standards for Hazardous Air Pollutants) (NESHAP) for Secondary Aluminum Production, and an Other Solid Waste Incinerator (OSWI) under 40 CFR 60, Subpart EEEE, New Source Performance Standards (NSPS) for Other Solid Waste Incineration Units. TI&M is a true minor source with a Potential to Emit (PTE) of 1.57 tons per year (TPY) combined PM emissions and a PTE of 1.42 TPY of total Hazardous Air Pollutants (HAPs). The aluminum sweat furnace has been out of operation since 2016. TI&M was issued the current permit following the submittal of an application to renew their permit, at which time it was identified that their incineration unit fell under the regulatory authority described in 40 CFR 60, Subpart EEEE. The facility submitted a revised application which included the introduction of a sodium bicarbonate injection system to control the pollutants regulated by Subpart EEEE, namely sulfur dioxide and hydrogen chloride gases. The sodium bicarbonate injection system is an alternative plan that was submitted to the EPA for approval along with a proposed operating parameter limits plan in August of 2015 and approved in September of 2016. The current air quality operating permit was issued on March 26, 2018 and expires on March 25, 2023.

The previous Full Compliance Evaluation (FCE) was conducted on September 21, 2016. A Notice of Violation (NOV) was issued after the FCE for not conducting inspections of the afterburner on the Aluminum Sweat Furnace and not submitting a semiannual report. The facility has been issued multiple NOVs since including; 4/25/2017 for exceeding SO₂ emissions from the OSWI unit during initial performance testing, 3/28/18 for not conducting a performance test within 12 months of the previous performance test, 1/18/2019 for violating emission limitations and opacity limits, 1/8/2020 for failure to operate sorbent injection system, emission

limitations and standards, failure to report excess emissions within 72 hours of event, failure to operate OSWI at operating temperature, and 5/29/2020 for failure to conduct a performance test within 12 months of the previous performance test and failure to conduct a RATA. TI&M submitted 1 excess emission report in December 2019, which resulted in an NOV. Four complaints have been reported at the facility since 2018.

Inspection Narrative

As I was approaching the facility on Tennessee Street I noticed a black plume of smoke in the air above where I believed the facility to be located. I pulled over to the side of the road and took some photographs (photo# 1). I proceeded down the road, parked my vehicle, and spoke with Joanne, who had observed the same smoke. She proceeded to observe the facility and smoke from behind the facility where an easement allows viewing from the opposite side. I moved my vehicle to the side of the road directly opposite the entrance to the facility (photo #2). I observed black/grey smoke rising from behind a berm. There was a front-end loader manipulating material against the berm that was producing a small amount of dust. The front-end loading activity was brief. I observed the smoke from the facility from approximately 9:20am until 9:35am. The smoke was fairly continuous although puffs of black smoke would periodically evolve and after a few moments the color would change to a dark grey. I noted a strong odor of plastic burning from the opposite side of the street. The smoke appeared to dissipate somewhat so I proceeded to the back of the facility where Joanne had parked. Again, observed smoke rising from the facility emanating from directly behind the baghouses where the incinerator loading point is located. I observed the smoke and facility from this point until 9:55am (photos #3&4, #7&8). With the sun at my back, I observed black smoke. I noted the instantaneous opacity using visual measurement of the plume at seventy percent at its maximum with periods of opacity as low as twenty percent. I observed some of the exhaust train ducting and noticed that the seams along the top edges of the steel structure had separated. I observed a section of round duct or hose associated with the bag houses that had a crack in it (photo #5&6). I did not notice fugitive emissions emanating from the seams nor from the crack in the hose.

We then proceeded to the main entrance of the facility. We entered and introduced ourselves as Pima County Department of Environmental Quality inspectors and stated that the purpose of this inspection was to conduct a Full Compliance Evaluation (FCE). We waited for Caitlin Goldsmith, General Manager, to arrive. Caitlin arrived and we completed the Notification of Inspection Rights Protocol (Attachment 1).

Joanne and I walked to the back of the property accompanied by Caitlin. A law enforcement agency was present during the entire time of our visit. They are responsible for loading a feed ramp with contraband to be fed into the incineration unit by the Tucson Iron and Metal operator. Upon arriving on site, I observed the unit in operation and smoke emanating from the opening of the incineration chamber at about 10:15am (photos # 9&10). I was told that this was normal operation during startup. We went into the control house, where I was introduced to Dan Butwinski, who was the operator on duty that day. Joanne had met Dan on previous occasions. Dan showed us the display inside the control house he uses to monitor some of the operating parameters for the OSWI. The display is a graphic with readouts of the discharge temperature, the afterburner temperature, the pre-baghouse temperature, and pressure differential readout

displayed (photo #11). Adjacent to that display is another monitor with the readouts, real time and averages, coming from the Continuous Emission Monitoring System (CEMS) (photo #12). I noticed that one of the readouts was showing red. Mr. Butwinski told me that the values in red were the instantaneous readout values for CO ppm emissions. To the right of the ppm field the one-minute average as well as the one-hour average CO values were displayed. The instantaneous and the one-minute average readouts showed high values for ppm CO. The onehour average was 36.7 ppm, below than 40 ppm threshold. I asked about the magnehelic gauge parameters and what happens if the pressure drop is out of the set parameters. Mr. Butwinski told me that an alarm would sound allowing them to address the situation. I asked what the protocol for a failed baghouse would be. Should parameters be breached and a failure of the baghouse itself occurred, Mrs. Goldsmith said that they would attempt to adjust parameters of the burn first and then would shut down the operation in the event of a failure. I asked Mr. Butwinski about the CO readings and why they might be high. He described the process of burning and that he manipulates the feed rate and the position of the dampers to control the process. Mr. Butwinski described how certain corrective actions can cause an upset in other parameters and that a process balance is challenging because of these fluctuations. For example, when temperature is increased the pressure will rise within the system train. This can cause upsets, like smoke coming out the front. But, this becomes necessary when ppm CO levels rise and the dampers need to be closed to promote more complete combustion with higher temperatures. Additionally, the feed rate of the system, controlled by the operator, must match the flow of air through the system which is controlled by the dampers. This feed is further constrained by a material permit condition which allows for 2000lbs of marijuana and 30lbs of other narcotics to be burned every hour.

I asked Mr. Butwinski about maintenance procedures for the system. He told me that they will temporarily patch holes as they locate them with ceramic wool until they can be repaired. He noted that an elbow in the duct work for the stack had developed a hole and we could see the blanket strapped over the hole as an example of a temporary fix. Mrs. Goldsmith said that they had ordered a new elbow to be fabricated and that it was undergoing production at the time of our visit. Mr. Butwinski said that maintenance was complicated by the fact that they can't identify leaks until they develop and are noticed via smoke coming out of them, or until they enter the system and visually inspect for leaks from inside by looking for sunlight.

After speaking with Mr. Butwinski, Mrs. Goldsmith proceeded to walk with us along the process train so we could observe the equipment in operation. As we exited the operator shack, I noted that smoke was still coming out of the opening where contraband is loaded (photos #13&14). This was at approximately 10:30am, an hour and a half after startup. I mentioned this to Mrs. Goldsmith and she indicated that it was below 20% opacity and not crossing property lines and therefore was acceptable as within permit conditions. I indicated that I was unsure that this was a correct interpretation of the permit. I indicated that perhaps there was an exemption for periods of startup and shutdown, but that I could not confirm that until I reviewed the permit with personnel more familiar with the specific interpretations of those rules.

We proceeded to walk the length of the incinerator barrel (Photos #15&16). It sits at a slight angle and slowly rotates, allowing material to progress through it as it burns. We observed the drop out area for ash (photos #17-19) and the afterburner unit which follows the ash bin. The

unit consists of a gas supply system, a blower to introduce gas to the burners, and two thermocouples which monitor temperature (photo #20). At this point, the exhaust train turns upward to a long cylindrical chamber where the exhaust gases must move around internal baffles. The baffles serve to increase the retention time of the exhaust gases as they move around the baffles through this cylinder. This cylinder sits approximately twenty feet above ground level (photos #21-23). Due to safety concerns we did not ascend any equipment at the site. From the cylinder the exhaust train proceeds to multiple lengths of descending and ascending duct work for the purpose of cooling the gases before they enter the baghouse. (photos #29 and #31&32). Along this duct work, the sorbent application system blows sorbent through hoses and into the exhaust train. Observing the system from a distance, I noticed that there was a significant amount of sorbent being blown into a cloud surrounding the unit (photos #24, #27, and #28). The tube delivering the sorbent to the squirrel cage blower is not shrouded or sealed and at least some of the sorbent is flung back out of this opening into the surrounding environment (photo #25). We asked to see inside the unit and a worker named Jaime accommodated us. The inside of the unit consists of a large bag of sorbent suspended above a hopper which feeds the blower (photo #26). Periodically the hopper is loaded with more sorbent. I momentarily observed the area behind the sorbent injection unit. The six hoses leading from the blower penetrate the walls of the exhaust train along the portion of ascending and descending ductwork. There was a lot of sorbent particulate in the area and I photographed the exhaust train from behind the sorbent injection system (photos #27&29). I noticed a power delivery unit to the sorbent injector which included a volt or amperage readout (photo #30).

I observed the top edge of multiple portions of the exhaust train and noticed multiple spots where the seam in the metal along the upper edge had separated. I noticed this also when I observed the exhaust train from off of the property. The broken seams had been observed during previous visits to the facility as well (photos #32, #33, and #34). I asked Mr. Butwinski about the seams and he indicated that they often don't know that there is a leak in the system until there are emissions. He indicated that the rainy season contributes to rust, combined with the vibrations associated with the equipment and the pressure differential along the exhaust train. I observed these cracks best from the area where I observed the baghouses and induction blower (photos #56-57).

We moved on to observe the CEMS (photos #38-40). The gas canisters present were not expired (photos #35-37). The CEMS read outs were showing 3.879ppm CO and 18.9%O₂.

We continued to observe the baghouse units and their pulse control unit (photos #42&43). The range in differential pressure that the pulse unit was set to was 3mmHg to 6mmHg. Should the pressure drop exceed 6mmHg, the pulse system should activate to keep the pressure drop below 6mm Hg. I asked if we could observe the unit in operation and Mr. Butkowski obliged by activating it manually. We heard the unit engage and after about thirty seconds of operation the pressure dropped down from about 5.5mmHg to about 5mmHg. We continued to observe the baghouses in operation along with the induction blower. I noticed an auger screw rotating along the bottom collection point of one of the baghouses. I observed the induction blower in operation (photos #45-47). It appeared to be vibrating significantly. Mr. Butwinski informed us that a contractor had been ordered to rebalance the motor. Following the ascending and descending portion of the exhaust train, the ductwork forks to pass exhaust through both of the two baghouses (photo #44). These inlets pass exhaust into the baghouses while the induction

blower draws those emissions through the baghouse filters, down an exhaust pipe and then pushes the exhaust out of a stack approximately forty feet high (photos #51&52). The induction blower, at the terminal end of the process, serves to pull exhaust all the way through the exhaust train from the very beginning, through treatment, through the baghouses, and out of the stack. We observed the ducting elbow with the hole in it, patched by ceramic wool and tow straps, which Mr. Butwinski had described to us earlier (photo #48). We observed the waste bin which collects the particulate matter caught by the baghouse filters. Particulate collected by the baghouse is sent through delivery hoses from the base of the baghouses via augers. The collection bin is plastic lined, and is contained via a metal lid. I noticed fugitive emissions escaping the collection bin looking like smoke (photos #53&54). I noticed a steady stream of particulate matter collecting on the plastic liner coming from where the fugitive emissions were emanating. I noticed a return hose going from the top of the containment lid back into the baghouse where particulates are collected (photos #50&55). The purpose of this is to collect those airborne particulates and to return them to the baghouse where they can settle out in the collection bin. The return hose prevents these from becoming fugitive emissions. The return hose had a large crack in it (photo #55). I brought the crack to Mrs. Goldsmith's attention and asked whether the fugitives coming out of the collection bin might be captured should that crack in the return hose be sealed. I asked if that might provide the negative pressure necessary to control those emissions. I told her that I couldn't tell them how to fix or operate their system but she indicated that she was making a note for repairs.

Following our walk around the OSWI, I again observed the front of the incineration train and noted smoke was still coming out of the front of the incineration unit. This was at about 11am. We again entered the operator's shack to take photo-records of documentation. Following this activity, I noted smoke was still emanating from the front of the unit (photo #58). This was at about 12:00pm, three hours after the beginning of the burn. I took about 12 minutes of video of the unit continuously smoking out the front. I made note of this to Mrs. Goldsmith, that it was more than three hours after startup, and that I didn't think that they had an exemption in their permit that would allow for this fugitive emission. Method 9 was not conducted at the time of inspection due to the location of the sun and the smoke emissions were not consistent over a 6 minute period.

I requested to look at the sorbent injection system. It had been about an hour or more since I first observed it and I noted that I had not observed someone refilling the system. Mr. Butwinski obliged by opening the sorbent injection hopper. I noted that there was still sorbent in the hopper. Mr. Butwinski told me that the hopper holds about 150lbs plus of sorbent and that they periodically fill it as necessary (photos #59&60). The hopper was about one third full when we looked and Mr. Butwinski refilled it as we watched.

Exit Interview

This concluded our physical inspection of the facility. I reiterated to Mrs. Goldsmith that I noted that smoke was coming out of the front of the unit, that this was beyond a period of startup and shutdown, and that a determination regarding this outcome would require review. I reiterated that I had observed some cracks in the infrastructure that I would note in the inspection report. I noted that we would require time to review the records produced and that if anything was missing that we may request additional records should they become necessary.

Off Site Records Review

Daily Operators Log for Incinerator:

The Daily Operator Log for Incinerator records the date, startup and shutdown times, and magnitude of the contraband burns on a daily basis, when burning. Also included are initial magnehelic gauge (MHG), first 4 hours, and second 4 hours' pressure readings. There are indications on this log for baghouse, refractory furnace, ductwork, motor bearing, and miscellaneous inspection boxes, each accompanied by a box indicating whether there were repairs necessary. In the records I reviewed there were no boxes checked indicating that repairs of the baghouses, refractory furnace, or ductwork were necessary except on December 20 2018 and on January 9, 2019. There were, in the comments section of those logs, notes discussing potential repairs. They do not include notes detailing if and when those repairs were made, except one record showing a repair completed on December 17, 2018 (photos # 61-63). There are notes included in the CEMS and DAHS sheets that note when afterburner problems occurred, but this is not reflected in the daily operator logs. An example occurred on December 13th, 2018 when a concerning visible emissions was made including a note saying that they will inspect when the system cools down, but I see no mention of the results of those repairs.

Tucson Furnace Contraband Incinerator Log:

The Tucson Furnace Contraband Incinerator Logs record the date, time of startup and shutdown, the total time, and contraband weight for a given burn for each day of a burn. The log differentiates the time of OSWI startup from the time contraband started to be fed in to the furnace and also differentiated the time the last piece of contraband was fed from the actual time the OSWI was shut down. The log also records the afterburner temperature at startup and shutdown. The records also include areas to record the date and time when the CEMS was inoperative, malfunctioning, out of control, and a section for detailing the corrective actions taken. Also included are similar fields for entries when the monitoring data shows deviations from CO limits. These entries include a description of the deviation, reasons, and corrective actions taken. The records occasionally state adjustments to afterburners, state that the CEMS was not operable or not accurate (photos # 64&65). When the CEMS is noted as needing adjustment, a note that an engineer was contacted is generally included. On April 17, 2018 there is a "No" box checked indicating that the CEMS was not available, but we see no indication of how the problem occurred or was resolved (photos #66&67). In the latter half of November through December of 2019, 4 out of 7 records, a CEMS fault of some kind is recorded. When observing the records from the first four months of 2020, CEMS problems arise in January with no explanation of what the problem was, but that an engineer was working on it. On every subsequent burn day through June 7, 2020 there are notes of CEMS miss-calibrations, multiple power surges causing upsets, malfunctions, and bad data due to new CEMS calibration errors.

Hourly, Daily, Monthly, and Rolling Average Emissions Reports

These records break down the emissions monitoring data for various CO, O_2 , and CO_2 , afterburner temperature, and dust collector differential pressure (photos # 68-71). The Hourly Emissions report indicated a twelve hour rolling average and a three hour rolling average that

appear to calculate based on that page alone. Reading a heading that says "CO @ 7% 12hour rolling avg (PPM)" really indicates an average of the rolling average for that day. When the "Rolling Average Reports" were reviewed, the numbers appear to have been calculated correctly. The prolonged delay in conducting a valid Relative Accuracy Test Audit (RATA) on their CEMS and the failure to do so after a new CEMS was installed invalidated all of the CEMS data produced from a year after their last successful RATA test.

CEMS Calibration Data

PDEQ requested CEMS Calibration data for the period beginning in March of 2018 through June 3rd of 2020, the time of our inspection. We received data ranging from November of 2017 through June 12th of 2020, the time at which an additional records request for these documents records request was fulfilled. These records detail calibration checks and calibration drift checks for a given day (Attachment 3). Comparing these records with rolling average reports, burn records, and CO data also recorded by the CEMS, PDEQ found that Tucson Iron & Metal failed to complete the required RATA test in 2019. It is important to note that the CEMS was calibrated daily in the records for 2017 and 2018, whether there is a burn occurring or no, but this practice was discontinued in March of 2019, when Tucson Iron & Metal started calibrating only on burn days.

April 19, 2019, the CEMS failed to pass a RATA. No re-test was done. Per the regulation, only a RATA test can be used to certify a failed RATA. Therefore, any of the data recorded by the CEMS from April 19, 2019 on is invalid. In December of 2019, the CEMS was replaced. No RATA or 7-day drift was reported for this CEMS, both of which are required when installing a new CEMS. Therefore, any data from Dec. 2019 on is also invalid.

In 2020, TI&M has used the new CEMS during the eight burns which occurred between January 22, 2020 and June 4, 2020. This data is also technically invalid because the CEMS has not been certified through a RATA, nor has any 7-day drift been reported.

Going back to 2018, the beginning of the period of requested data, TI&M burned on days when the CEMS did not pass the 2x drift requirement. This does not render the CEMS "out-of-control", as defined by the regulations (40CFR60 Appendix F 4.3), which states that the 2x failure must occur 5 consecutive days in order for the CEMS to be out-of-control. Out-of-control CEMS data is invalid. The 2018 CEMS data did not exceed the 5 consecutive days of 2x the drift requirement nor 4x the drift requirement during a burn cycle. Based on that, the conclusion is that the 2018 data is valid. However as described in 40 CFR 60.13(d)..." The CEMS calibration must, as minimum, be adjusted whenever the daily zero (or low-level) CD or the daily high-level CD exceeds two times the limits of the applicable PS's in appendix B of this regulation." PDEQ saw no record of adjustments nor records of repeated drift checks that would be done following an adjustment.

With respect to the 2x drift criteria for 2018, 13 of the 19 burns, more than 50% of calibrations, resulted in failures. Data is missing for June 28-30, 2018, with 4 out of 7 days failing calibration preceding a burn on June 28th. Although there is not a technical failure, the consistency of this data is concerning.

PDEQ found that TI&M does not calculate nor do they report 7-day calibration drift measures. although the regulations clearly state this is QA/QC measure required of all CEMS owners (EPA 40CFR60 Performance Spec 4/4a 13.1. Calibration Drift. The CEMS calibration must not drift or deviate from the reference value of the calibration gas, gas cell, or optical filter by more than 5 percent of the established span value for 6 out of 7 test days). During a meeting that included TIM personnel and Pima County DEQ personnel, Mr. Kippur stated that because they do not burn for seven consecutive days they are not required to do so. Pima County acknowledges that the burns generally don't go beyond 3 days, but there are daily calibration data in 2018 that could be used to calculate 7-day drift. Also, the regulations state that it can be seven consecutive days or seven consecutive operating days, as per EPA 40CFR 60 Appendix B Performance Specification 2 8.3.1 and 4/4a. Had 7-day drifts been done, this pattern of not meeting 6 out of 7 days of calibration drifts that are within 5% of the span would have been noticed and corrections could be made to ensure more accurate data. Frequently, the data for 2018 and the 7-day drift criteria for this period does not meet these criteria. In the first quarter, the very first burn did not meet these criteria. Looking at January 9, 2018, if you choose the first seven days of the year, which include the burn on 01/09/18, the data meets the criteria on 4 out of 7 days. If we adjust our 7-day window to include two days following the 9th and exclude the first two in the set the data meets the criteria 5 out of 7 days, which still falls short of the regulatory requirement. In February, the data fails almost the whole month for this criteria. In March, the data improves.

In the second quarter of 2018, the data fails the criteria more than it meets it. Still considering the 7-day drift criteria, beginning in April of 2018, the 5% 7-day drift requirement passes 6 out of 7 days. However, if you look at April 3 and adjust the window, the drift passes 5 out of 7 days. Starting April 4th, it becomes 4 out of 7. When we consider April 10th, a day when the 7-day window can be shifted around the burn day, at any point in the calculation we find that the 7-day drift requirement is met on 4 out of 7 days. Throughout 2018 this seems to be the norm, rather than the exception.

Discussion

All the Daily Operator Logs records show baghouse checks are complete. In the comments section of these records on 12/13/2018 and 12/14/2018 there were notes that visible emissions were present and that an inspection of the duct work needs to happen. On 12/17/2018 there is a note that a hole in the duct had been repaired. Again, on 12/20/2018, a note of "slight emissions visible", "possible leak in baghouse", "will inspect and repair before next burn on 1/9/19." In only two records, dates 12/20/2018 and 1/9/2019 are "Ductwork Inspected: "Yes" Repairs "Yes" boxes checked.

A review of a December 20th 2018 inspection report completed in response to a complaint of black smoke coming from the property references these records and the associated repairs (Attachment 4). During that visit, Tucson Iron and Metal was observed to have smoke coming out of the front of the incinerator. This was after the repairs mentioned in those records. Tucson Iron and metal received a Notice of Violation for deficiencies of permit conditions 51.d. 51.e, and 73. Condition 51.d states that all emissions from the OSWI must be drawn through the secondary chamber and control devices. Conditions 51.e and 73 reference the opacity limitations

set forth in the emissions limitations as they apply to the OSWI specifically and opacity limitations as they apply to the facility wide and operations and general conditions of the permit. During my visit I was unable to complete an ALT 82 nor a Method 9 observation, however, there is clearly a deficiency of permit condition 51.d. The finding that smoke was issuing from the front of the OSWI following a period of maintenance is concerning. The inspection report from 2018 does indicate that when the baghouse pulse cleaning mechanism activated and when the pressure drop decreased the fugitive smoke was no longer emitting.

I see no additional notes regarding necessary repairs following this time period. It is obvious to me that during previous visits to observe the facility from offsite and that during my walkthrough of the facility that the upper seams of the exhaust train are separating. There appears to be sufficient time in between burn days to accomplish these repairs. The wear and tear on the system due to vibration, water damage, and fluctuations in temperature are all anticipatable.

During our inspection we observed smoke emanating from the front of the unit for the entire duration of our visit. The records for the 3rd of June 2020 do not indicate fugitive emissions, process upset, nor detail any necessary repairs. In previous visits to the facility during burn days, we have observed the unit operating without smoke coming from the front. When reviewing records from previous records requests, PDEQ was provided with a set of records titled "Daily Operator Log Rotary Furnace Deficiency and Repair Report." These records span only the first two months of 2020. These records mention bag house leak check, CEMS and various afterburner adjustments, as well as activity to vacuum rust from the baghouses. Upon reviewing the findings in the 2018 inspection report and subsequent Notice of Violation, upon seeing that fugitive emissions persisted after the 2018 repairs, knowing that fugitive emissions were present at the time of my inspection, and seeing a lack of notes detailing maintenance on the ductwork that I could see cracks in, I see a continued pattern of noncompliance in line with previous inspections findings.

51. Emission Limitations

- b. Permittee shall operate and maintain the OSWI in accordance with the approved operation and maintenance plan in Attachment 4 of this permit.
- d. All emissions from the OSWI must be drawn through the secondary chamber (afterburner), cooling towers, and baghouses (Baghouse 1 and Baghouse 2) for final emissions control. The OSWI, afterburner, sorbent injection system, cooling towers, baghouses, and associated ductwork must be maintained and operated using good modern practices.

70. Maintenance Requirement

The Permittee shall, at all times, including periods of startup, shutdown, and malfunction, to the extent practicable, maintain and operate all equipment in a manner consistent with good air pollution control for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to,

monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

Compliance Summary

After review of the inspection results and records at the time of the inspection, PDEQ has not made a compliance determination upon completion of the Full Compliance Evaluation.

Attachment 1: Notification of Inspection Rights

Attachment 2: Photo Log

Attachment 3: Burn Day Summary

Attachment 4: 2018 December Inspection Report



PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY 33 N. Stone Avenue, Suite 700, Tucson, AZ 85701-1429

Phone (520) 724-7400 FAX (520) 838-7432 http://webcms.pima.gov/government/environmental_quality/

AIR PROGRAM NOTIFICATION OF INSPECTION RIGHTS

SOURCE INFORMATION

PC #	*	Permit # 1 '	<u> </u>
Regulated Person VCSON IFON	& Metal		
On-site Representative Caitlin	Goldsmith	Title General	Marager
On-site Representative Caitling Site Location 4484 E Tenne	55ee st	_ Phone _ うん。	7418-1900
Site Contact			
Mailing Address			
	DEO INFORMATION		
	in was in the Language Constitution		
Inspector Name Twothy Green	ity	Phone 724	7342
Inspector Name Truthy Green Inspection Date June 3 70	20 <u> </u>	_Time1010	6
Accompanied by Joanne S	_		
Questions or comments on these proceed directed to the Pima County Department at (520) 724-7400. While I have the ristill proceed with the inspection under P	t of Environmental Quality (I ght to decline to sign this for	PDEQ) inspector lism, the PDEQ repres	ted on this form
☐ I acknowledge that I have read and			
Signature COUPFOLD	mA	Date $\frac{6/3}{}$	120
]	Refused to sign the 1	Notification.
☐ Authorized on-site representative is n	not present at the facility.		

Pima County Department of Environmental Quality Air Program

Photographic Log

Site Location: 4484 E Tennessee St

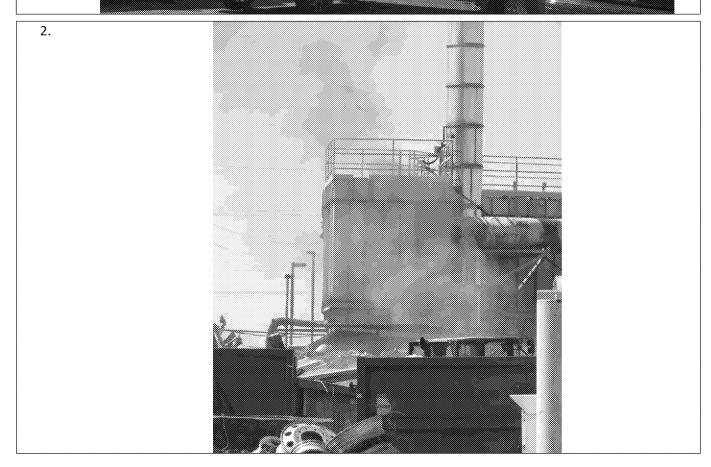
Tracking #: 127-00021

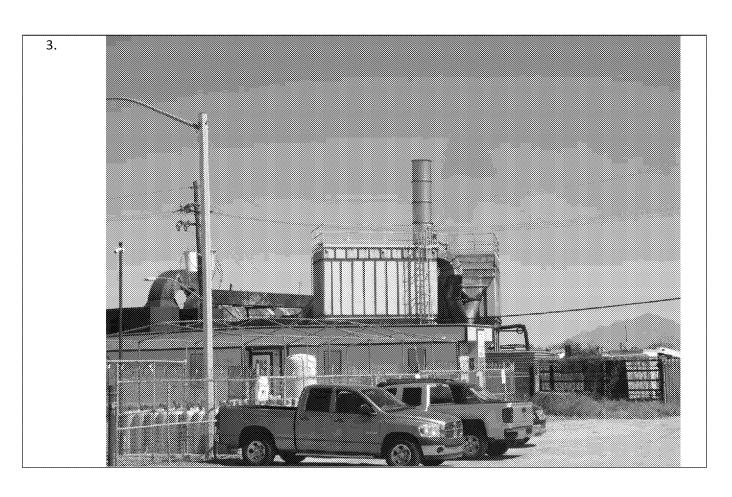
Date: June 3, 2020

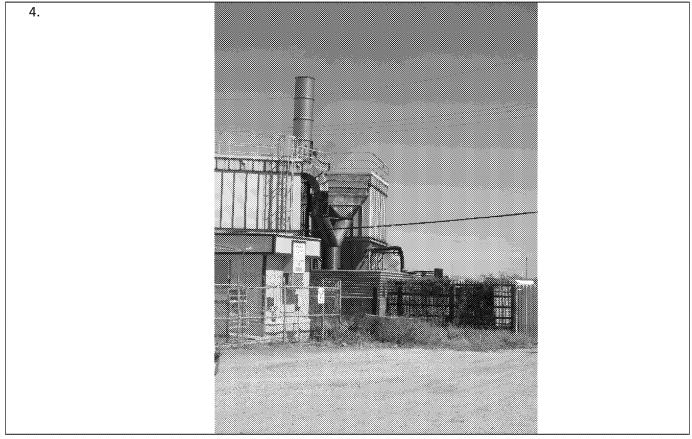
1.

Photographer: Tim Gentry/Joanne Sufi

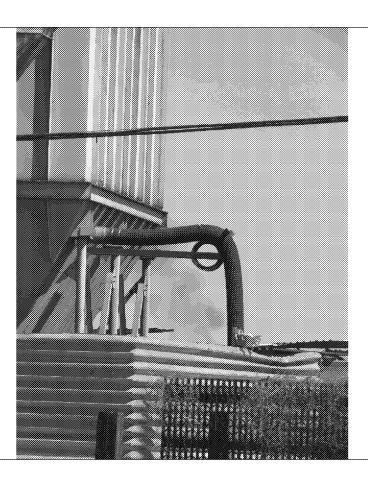


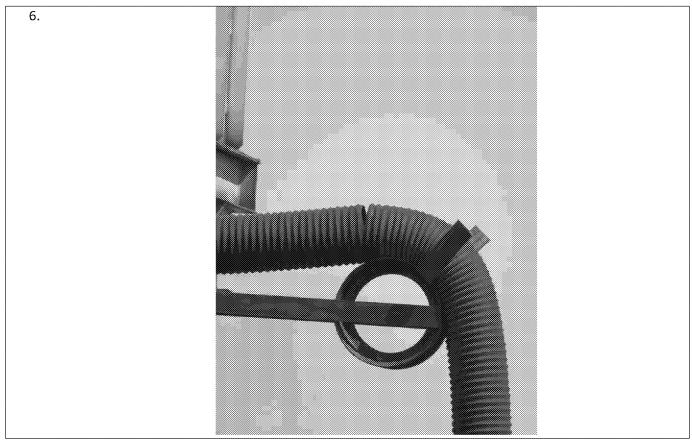






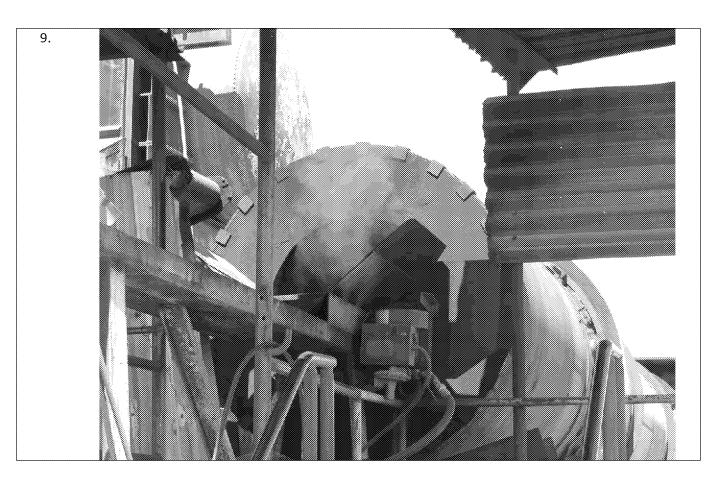
5.

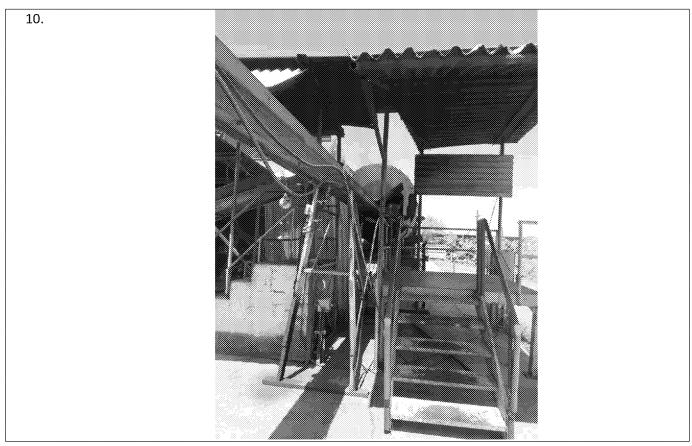


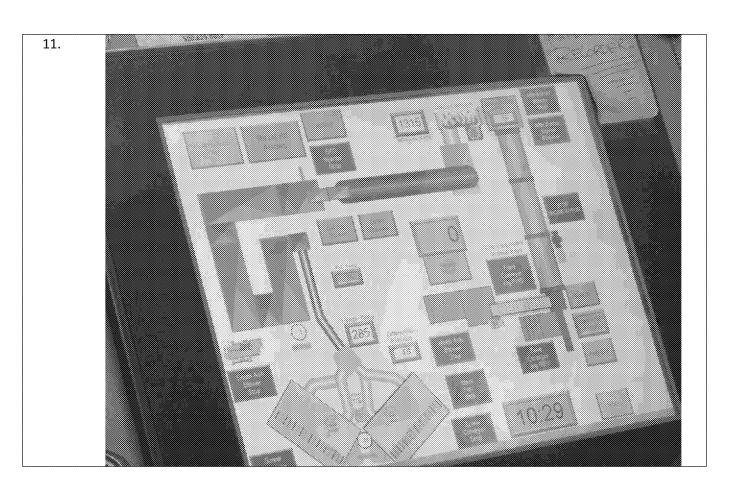


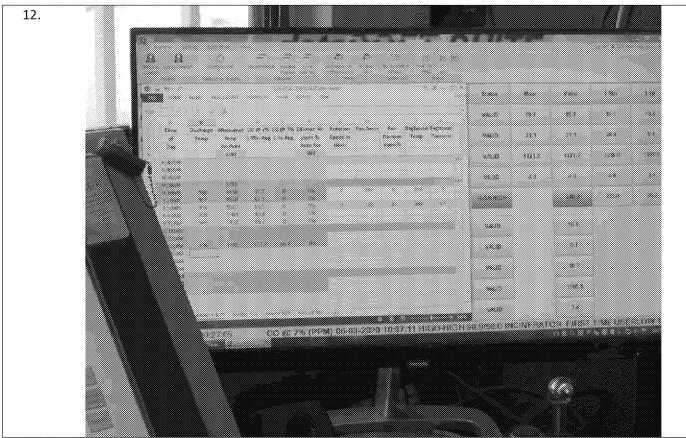






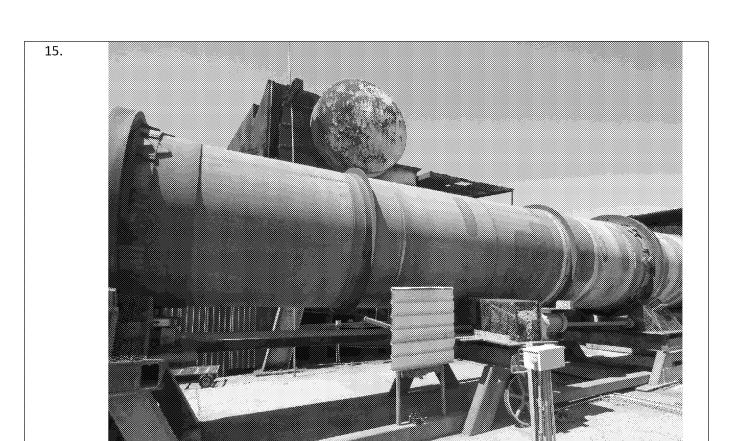


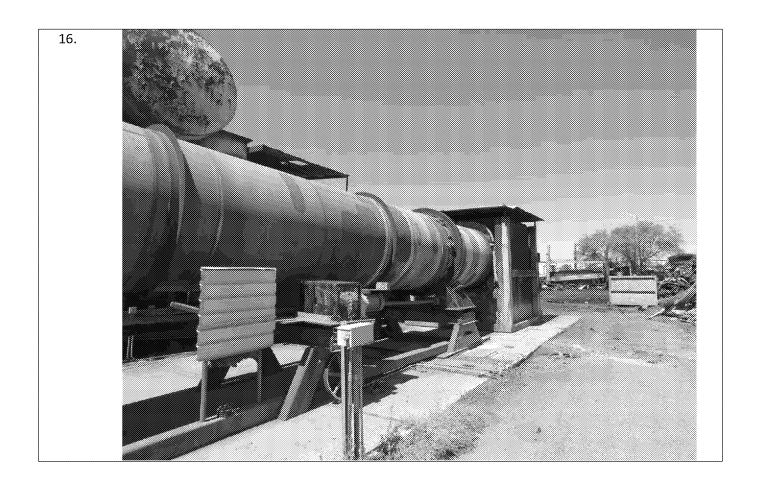


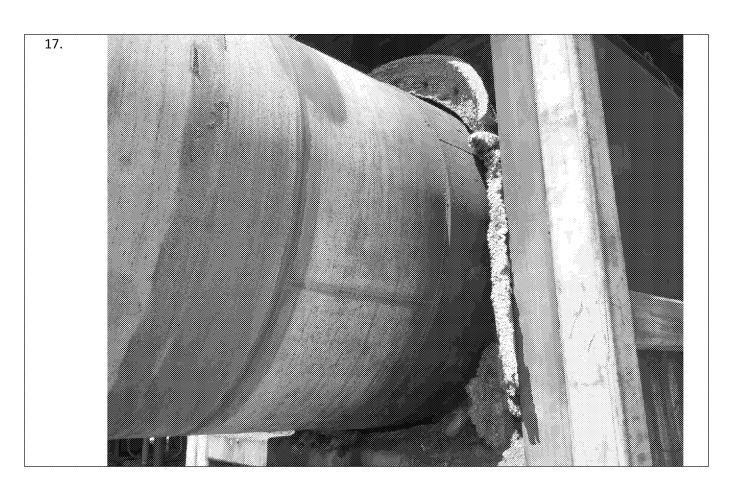


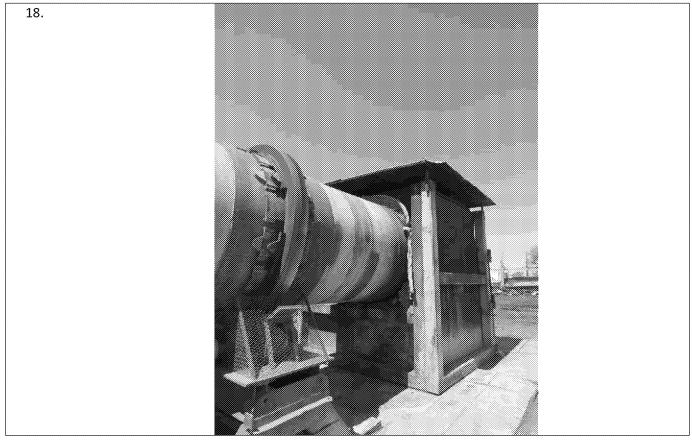


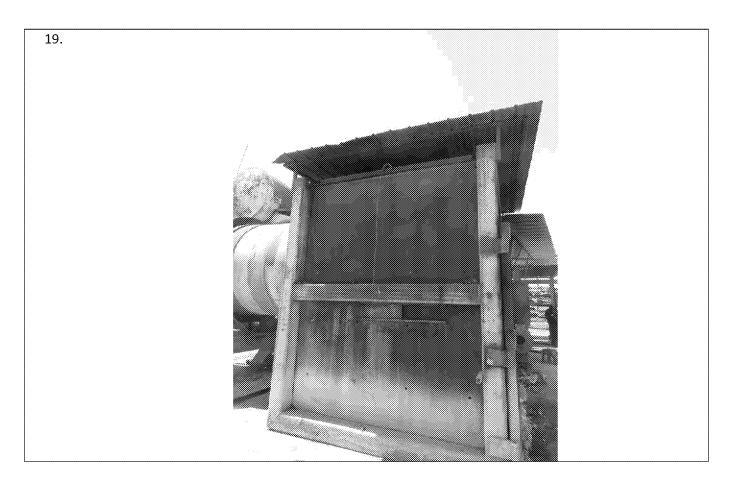


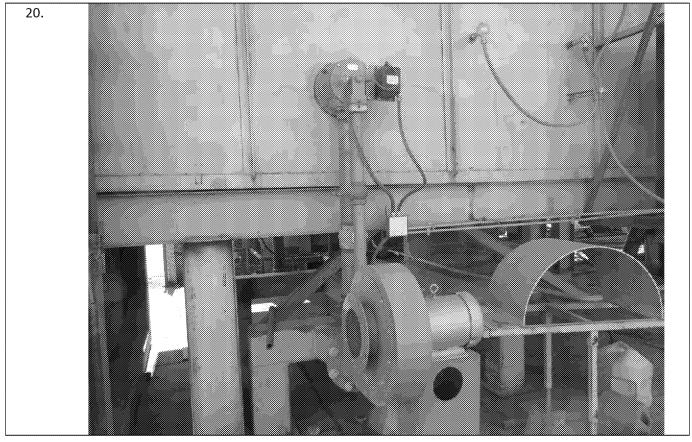










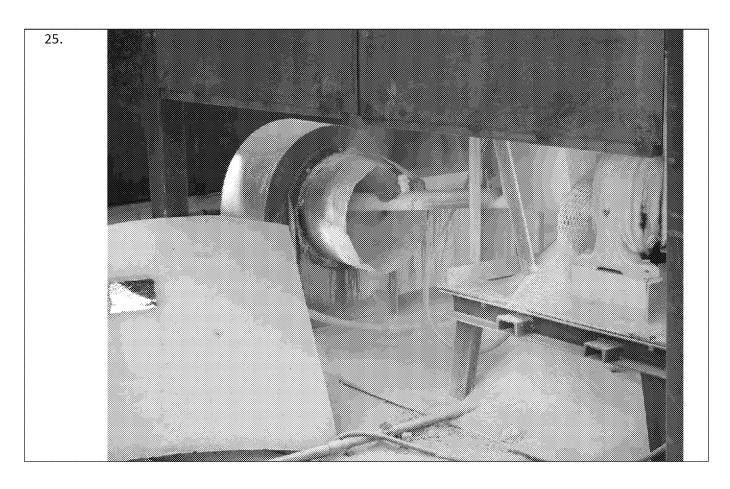


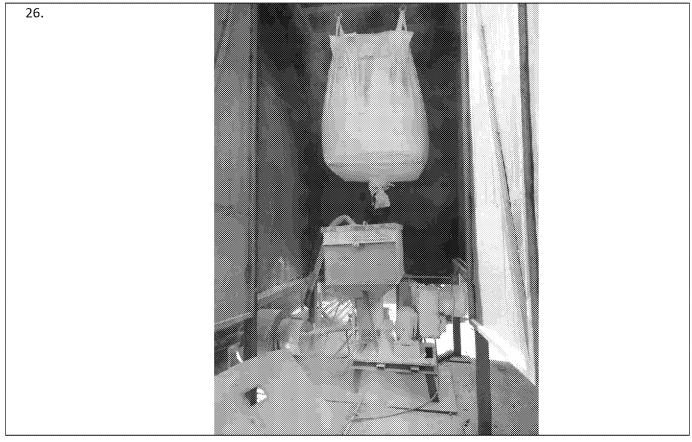




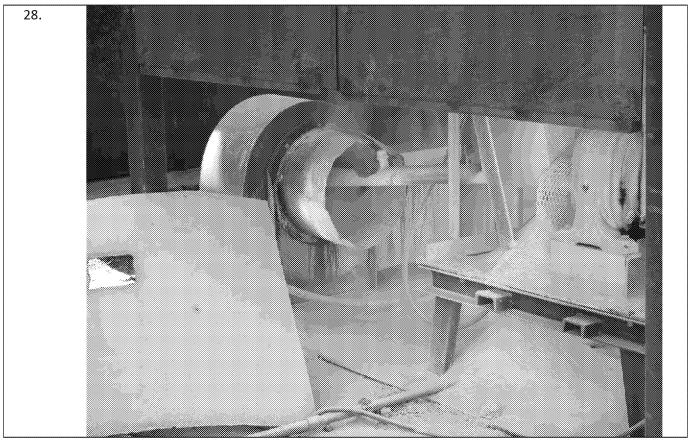






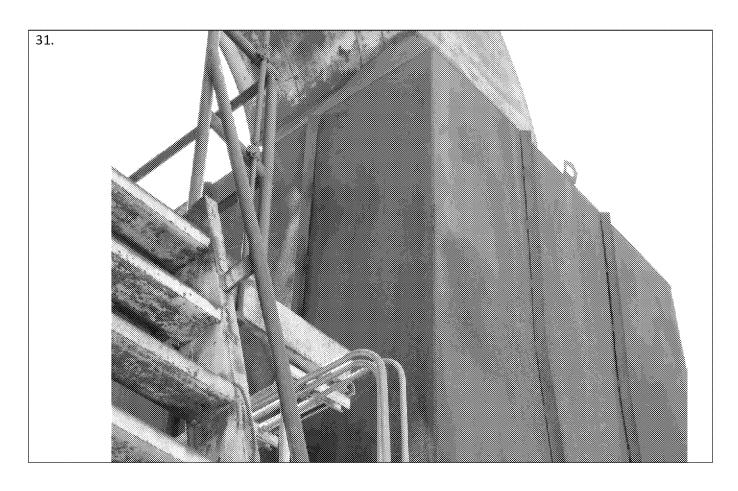




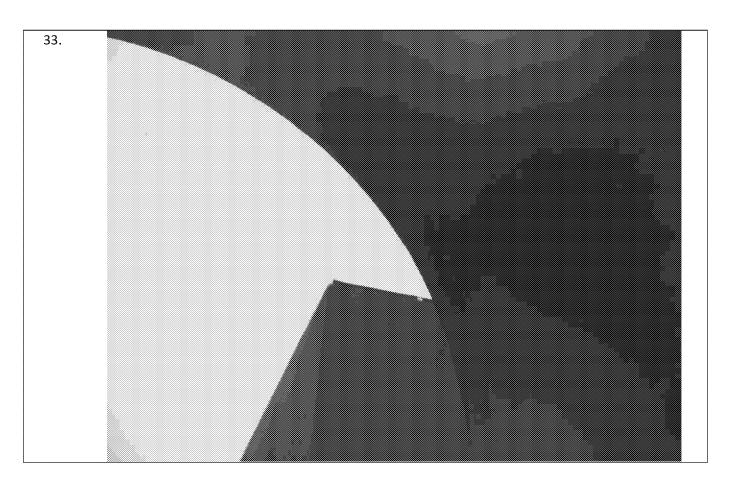


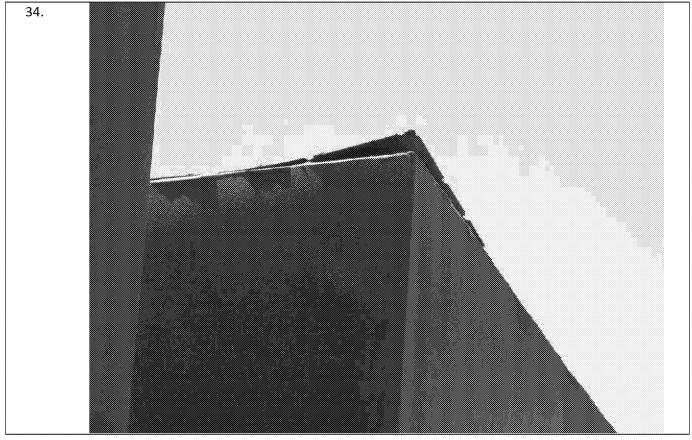












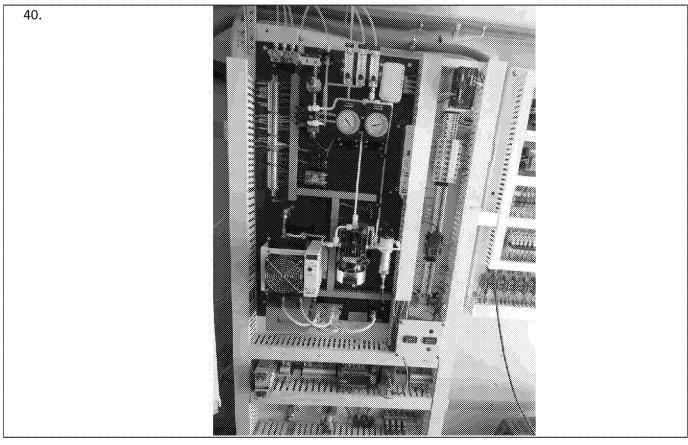


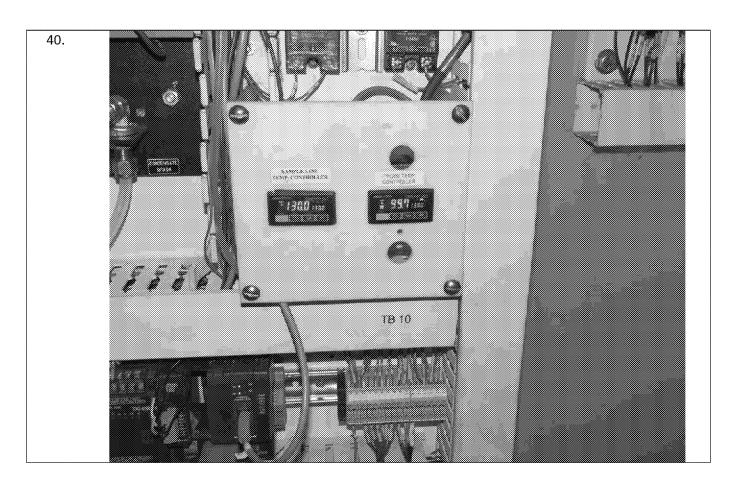


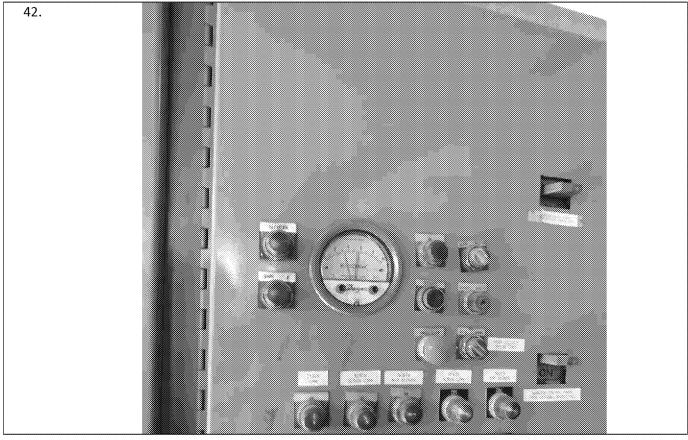




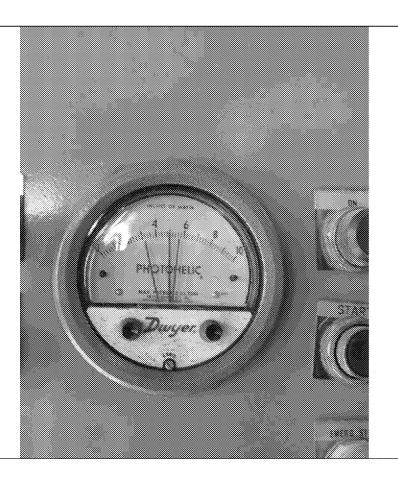


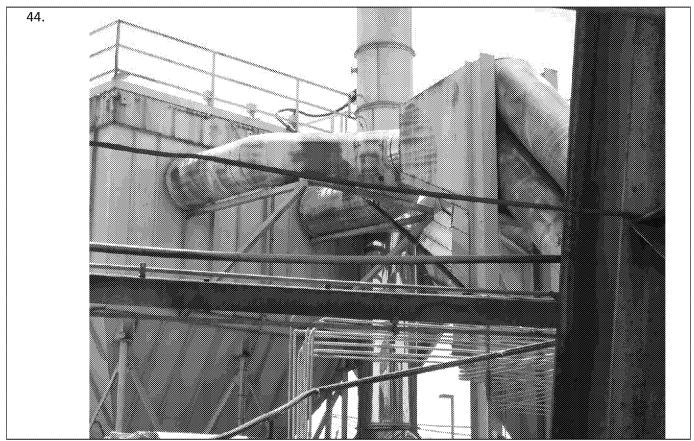


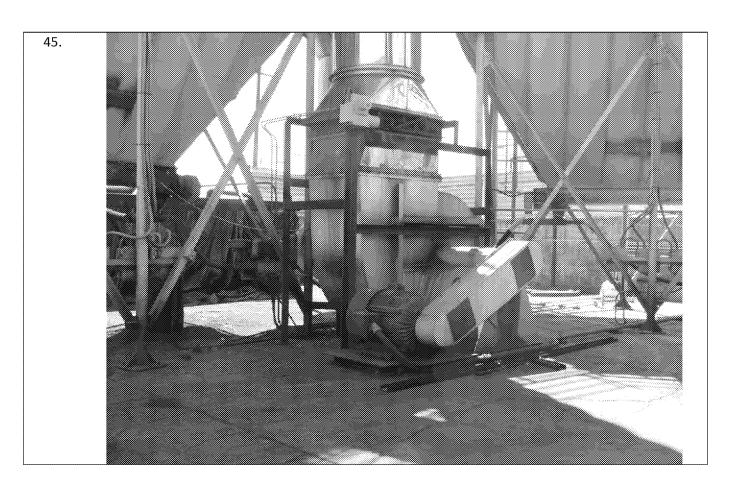




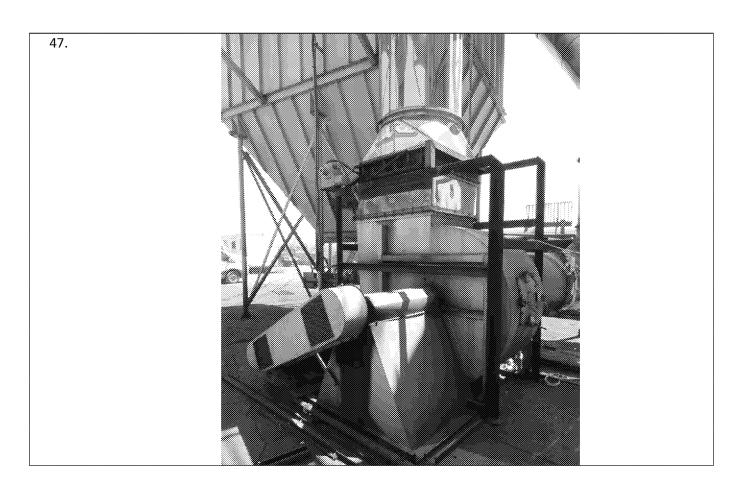
43.









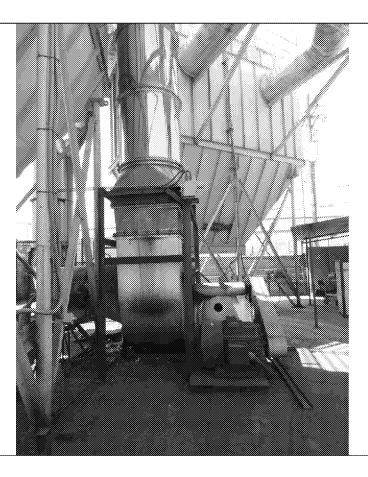


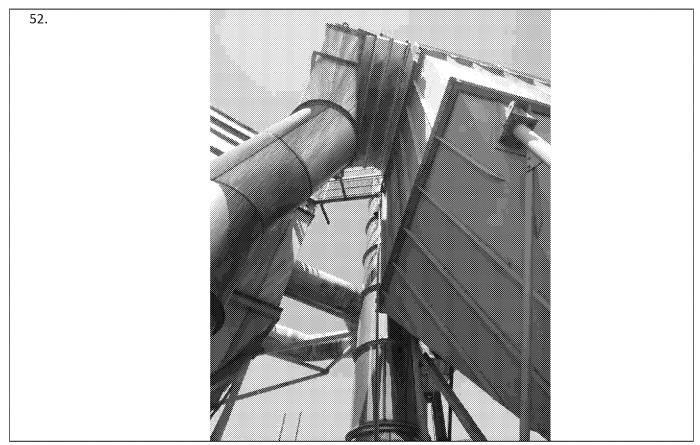






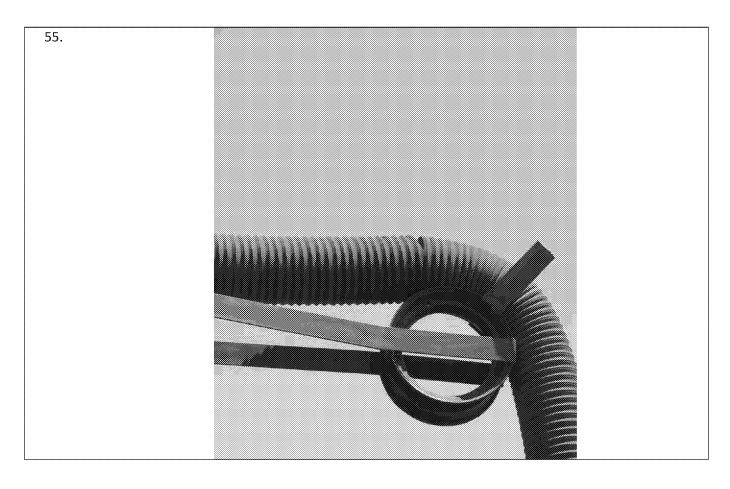
51.

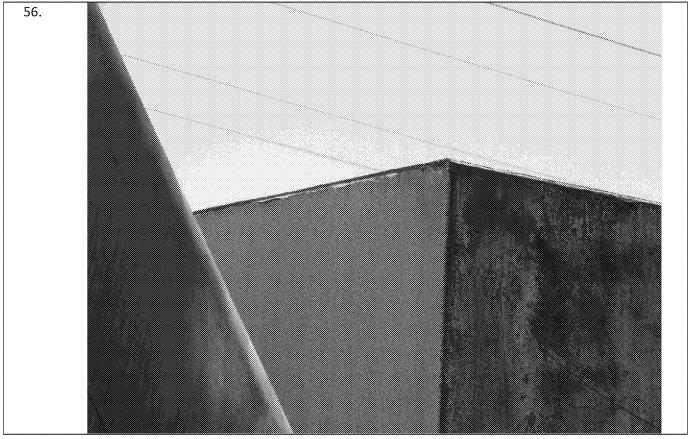






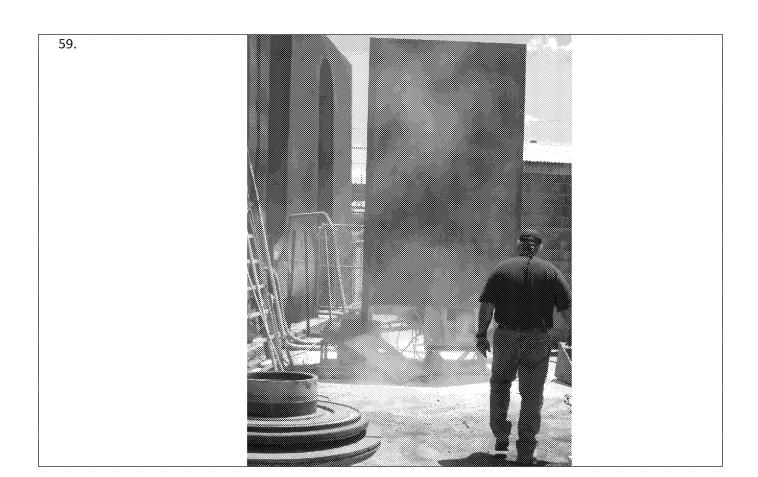


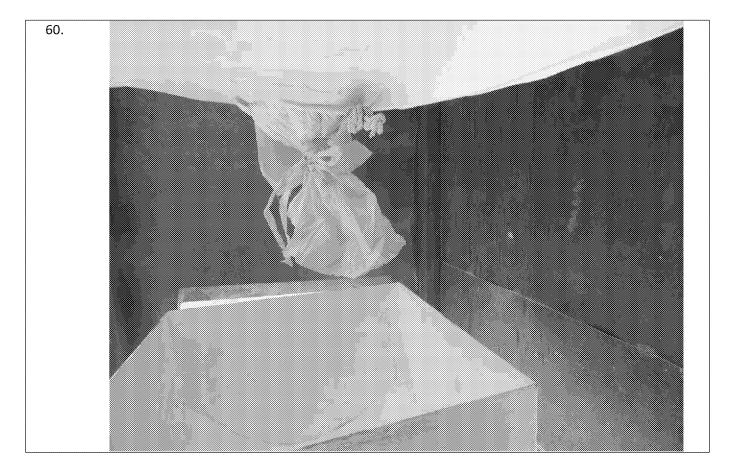


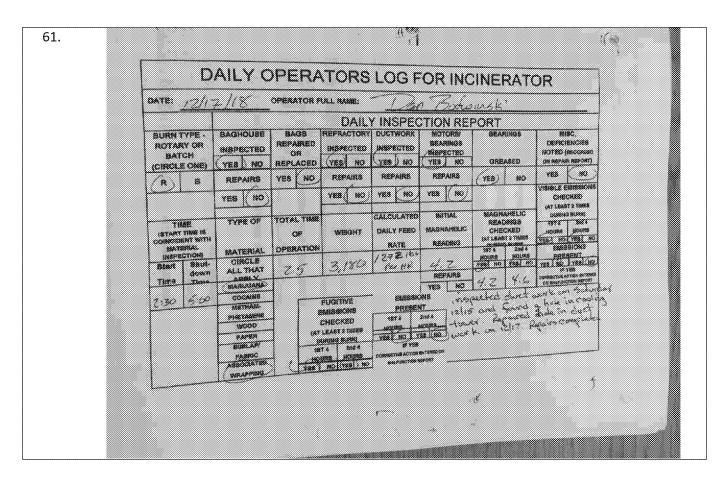


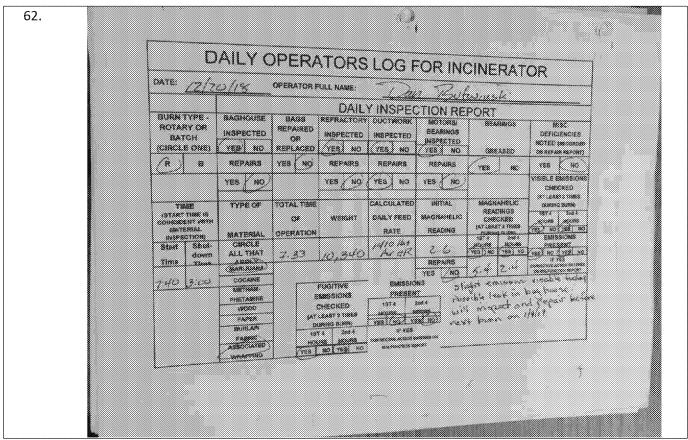


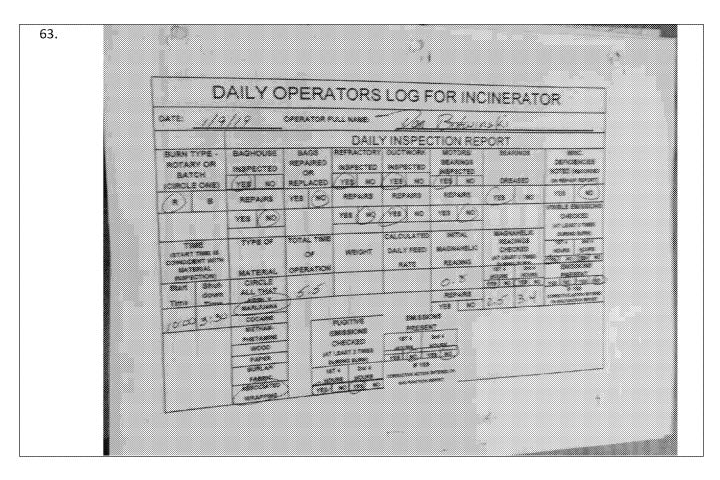










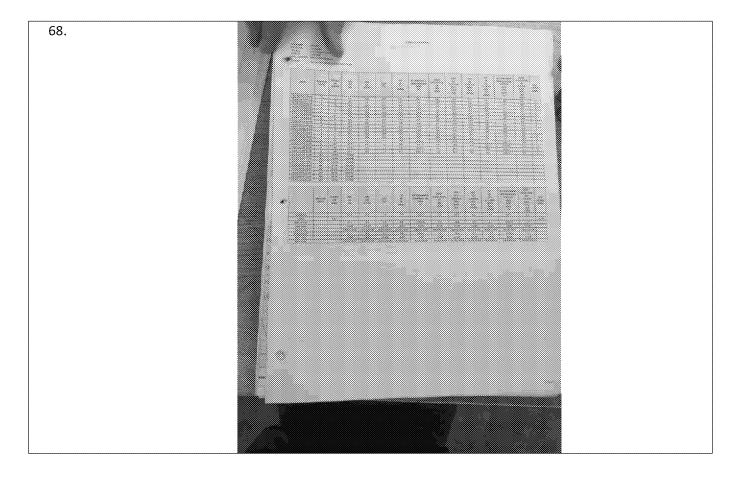


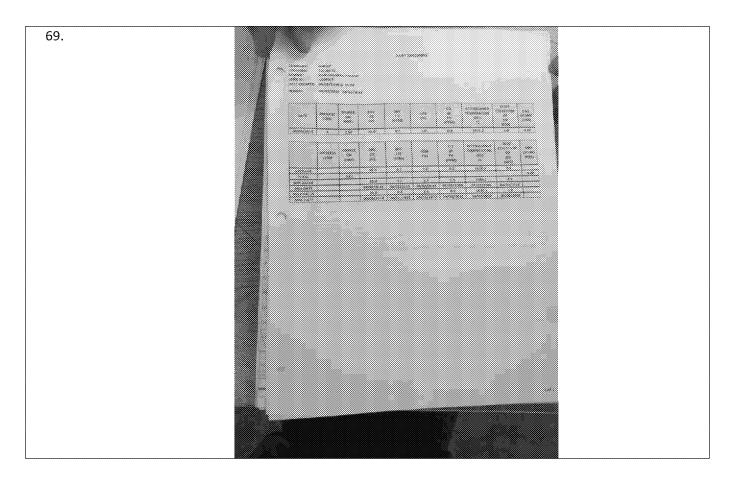
64.	
	Con and a second se
	Procedure for the company of the company and the company of the co
	personnel of the order exists seem extraording (ECON) and the largest Convention (ECON) and ECON (ECON) and EC
	Quartised in Common Stone: Let Broke 200 54" 1. Commond with increased 1,740 person becomes proper to be t
	September 2 No. September 1/20 September 2/2
	DEA Facel Microsy Facel Microsy
	Total Class Committee Committee Committee Class Committee Committe
	The State of the S
	Court for Strengthalian Security Securi
	Accorded The support and support registers are defined as a support of the suppor

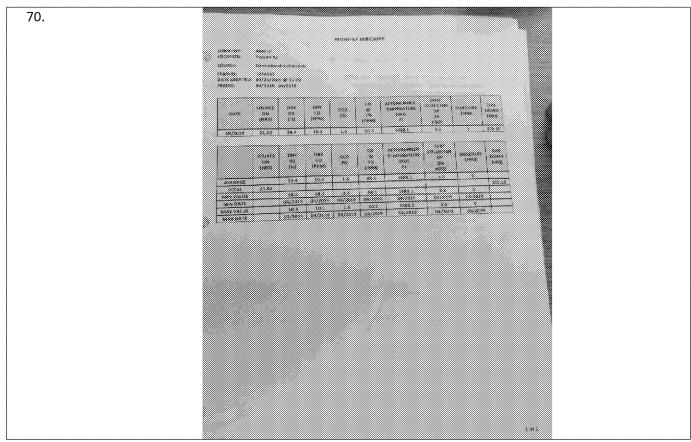
65.		
•	Visite County Continues and a property of the	
	s - Chamby the last see than to which COM are are accepted to 6/23/14	
	shows the computer that and the contract of t	
	Constitution of the consti	
	We did DET continuous and provide transferring the anticipate? Pipe 1.179 If the though the date and man for dark mapping in the build are not existenced by an existence of the continuous transferrence of the continuous t	
•		

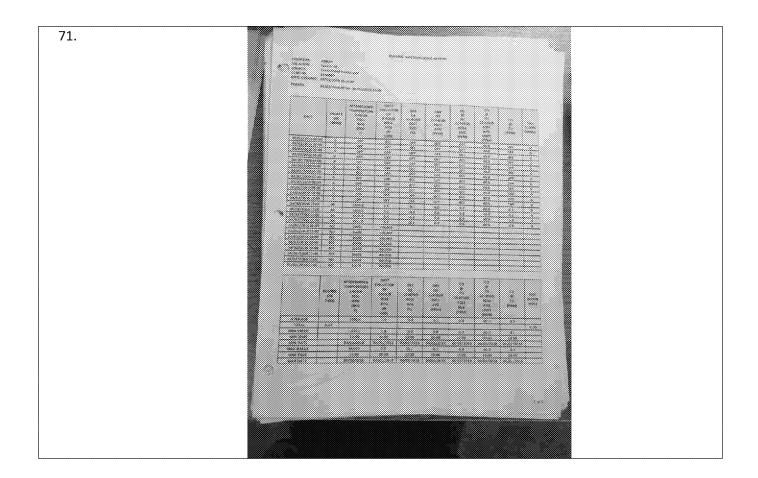
66.		
	The applying of processing against the state of the state	
	Secret of Anti-Control Office of Control Office	
	Constitution of the Conference	
	Three of One Storing Code and Commission Find Commission 47, 500 Note: Maximum permit allowable dustring of storing period in 1.5 to one)	
	The of the common continue	
	Time of Day (SWT) for Stock would be	
	After training Chamber Temperature: When Commissed Free Brance: Record of members assisted on maintenance measuring continuents. (Part) Record of members assisted on maintenance measuring continuents.	

Security for coloring that are security and the security of th









					CO ppm @							
		Source on	CO ppm	3-hr	7% O ₂ 12-	CO Cal		CO Cal				
Date		(mins)	@ 7% O ₂	Rolling	hr rolling	Zero	Pass/Fail	Span	Pass/Fail	OC Status	Span Ac	tual Drift
1/9/2018	10:00	60	82.2	31	27.2	3:12	P	3:12	F-2x	P	-28	
	11:00	60	8.2	31.5	23.1		1/5/2018	P	4.3	1/10/2018	P]
	12:00	60	1.5	30.6	22.8		1/6/2018	P	-7.6	1/11/2018	4x	-46.6
	13:00	60	18.4	9.4	22.1		1/7/2018	2x	-28	1/12/2018	P	-1.6
	14:00	50	1.2	7	21.9		1/8/2018	P	-13.6	1/13/2018	P	-9.4
1/30/2018	9:00	46	82.1	33.9	28	3:12	P	3:12	F-4x	F	-50.2	
	10:00	60	2.9	28.7	27.4	8:37	P	8:37	F-2x	P	-24.4	
	11:00	60	18.4	34.5	28.5		1/25/2018	p	-10.1	1/31/2018	P	1.2
	12:00	60	16.1	12.5	22.6		1/26/2018	P	-14.6	2/1/2018	2x	-36.8
	13:00	60	24.9	19.8	22.2		1/27/2018	P	-8.8	2/2/2018	4x	-63.6
	14:00	60	10.5	17.2	22.6		1/28/2018	P	-6.6	2/3/2018	2x	23.4
	15:00	4	49.2	28.2	26.3		1/29/2018	2x	-36.7	2/4/2018	No cal	
2/6/2018	10:00	46	Fault	29.9	21.2	11:02	P	11:03	F-4x	F	-450.6	
	11:00	60	Fault	49.2	22.5	11:53	P	11:53	F-4x	F	-450.6	
	12:00	60	Fault	Fault	24.9	13:28	P	13:28	F-4x	F	-450.6	
	13:00	60	Drift	Drift	25.7		2/2/2018	4x	-63.6	2/7/2018	4x	-448.8
	14:00	44	Drift	Drift	29.2		2/3/2018	2x	23.4	2/8/2018	4x	-404.1
	15:00	46	Fault	Fault	20.3		2/4/2018	No cal		2/9/2018	4x	-4 39.6
	16:00	60	Fault	Fault	23.8		2/5/2018	No cal		2/10/2018	4x	395.5
	17:00	60	Fault	Fault	25.2							
	18:00	60	Drift	Drift	28.2							
	19:00	44	Drift	Drift	29.9							
2/14/2018	8:00	29	Off	Off	49.2	12:21	P	12:21	F-4x	F	-414.4	
	9:00	60	Fault	Fault	Fault							
	10:00	60	Fault	Fault	Fault		2/9/2018	4x	-439.6	2/15/2018	4x	-356.7
	11:00	60	Fault	Fault	Fault		2/10/2018	4x	395.5	2/16/2018	4x	-444.6
	12:00	60	Fault	Fault	Fault		2/11/2018	4x	-413.6	2/17/2018	4x	-355.6
	13:00	60	Fault	Fault	Fault		2/12/2018	4x	450.6	2/18/2018	4x	-431.4
	14:00	28	Off	Off	Off		2/13/2018		No cal	2/19/2018	4x	-383.1
2/27/2018	8:00	14	53	53	53	3:14	P	3:14	P	P	-6.9	
	9:00	60	33.6	48.3	49.3							
	10:00	60	41.8	42.8	42.8		2/23/2018	P	-17.6	2/28/2018	2x	22.4

	***************************************			~	CO ppm @						***************************************	
		Source on	CO ppm	3-hr	7% O ₂ 12-	CO Cal		CO Cal				
Date		(mins)	@ 7% O ₂	Rolling	hr rolling	Zero	Pass/Fail	Span	Pass/Fail	OC Status		tual Drift
	11:00	60	72	49.2	50.2		2/24/2018	4x	-56.6	3/1/2018	P	-13.6
	12:00	60	44.5	52.8	48		2/25/2018	2x	-30.6	3/2/2018	2x	31.4
	13:00	7	0.6	39	40.5		2/26/2018	P	-15.3	3/3/2018	2x	29.4
3/21/2018	10:00	29	8.2	17.8	36.2	6 cals P, F	P, P, P, 2x. 2x					
	11:00	60	12.1	7	33.2	-3.6, -12	2.6, -2.6, -0.1,	-27.6, 34		3/18/2018	2x	22.4
	12:00	60	14.5	11.6	31.1					3/19/2018	P	10.7
	13:00	26	9.5	12	29					3/20/2018	P	-19.5
3/22/2018	8:00	44	3	90	26.6	3:14	P	3:14	P	P	15.4	
	9:00	60	8.2	6.9	25.1							
	10:00	60	30.5	13.9	23.2		3/18/2018	2x	22.4	3/23/2018	P	2.9
	11:00	60	18.3	19	21.9		3/19/2018	P	10.7	3/24/2018	P	-10.6
	12:00	57	166.9	71.9	32.4		3/20/2018	P	-19.5	3/25/2018	P	-13.8
	13:00	60	12.6	65.9	27.4					3/26/2018	2x	-28.2
	14:00	54	10.1	68.2	24.5					3/27/2018	P	-0.4
	15:00	32	19.5	14.1	26.1							
3/28/2018	8:00	43	1.5	10,4	25.6	3:14	P	3:14	P	P	-10.4	
	9:00	60	2.2	7.7	24.7							
	10:00	60	34.3	12.7	26.4		3/24/2018	Р	-10.6			
	11:00	60	0.7	12.4	25.7		3/25/2018	P	-13.8			
	12:00	60	1.2	12.1	25.5		3/26/2018	2x	-28.2			
	13:00	60	0.5	0.8	24.9		3/27/2018	P	-0.4			
	14:00	42	0.4	0.7	22.4							
3/29/2018	8:00	37	20.2	70	22.5	3:14	P	3:14	P	P	1.8	
	9:00	60	1.6	7.4	8.7							
	10:00	60	7.8	9.9	8.3							
	11:00	60	30.9	13.4	10.1							
	12:00	60	11,4	16.7	9.4							
	13:00	58	6.6	46.3	9.8							
	14:00	53	5.1	7.7	10.1							
3/30/2018	8:00	22	4	5.2	7.5	3:14	P	3:14	P	P	12.5	
	9:00	60	7.9	5.7	8.1							
	10:00	60	6	6	8.5		3/31/2018	P	-11.8			

Date		Source on (mins)	CO ppm @ 7% O ₂	CO ppm @ 7% O ₂ 3-hr Rolling	CO ppm @ 7% O ₂ 12- hr rolling	CO Cal Zero	Pass/Fail	CO Cal Span	Pass/Fail	OC Status	Span Actual Dri
***************************************	11:00	60	6.4	6.8	9						
	12:00	31	5.5	6	9.5						
2018 Q1	Quarter Burn Counts	3406	Failed Cal Hours (includes 2x)	1537.0	Percent Potentially inaccurate data	50.1	Test for 75% of 90%*	49.9	Does not m	eet permit cri	teria
4/2/2018	12:00	40	0.2	4	7.8	3:14	P	3:14	Р	P	19.4
	13:00	60	0.1	1.9	7.7		_		_		
	14:00	60	2.4	0.9	7.2						
	15:00	60	0.9	1.1	4.7						
	16:00	15	0	1.1	3.8						
4/3/2018	7:00	37	5,4	2.1		3:15	P	3:15	P	P	-15.1
	8:00	60	4.6	3.3							
	9:00	60	4.6	4.9							
	10:00	60	5.1	4.8							
	11:00	60	3.8	4.5							
	12:00	60	1.6	3.5							
	13:00	60	1.7	2.4	2.5						
	14:00	3	15.5	6.3	3.8						
4/4/2018	8:00	49	18.1	11.8	5.3	3:15	P	3:15	P	P	10.8
	9:00	60	12	15.2	6.1						
	10:00	60	9.6	13.2	6.8						
	11:00	60	15.9	12.5	8.2						
	12:00	60	17.7	14.4	9.2						
	13:00	60	16.8	16.8	10.2						
	14:00	583	17.9	17.5	11.3						
4/5/2018	8:00	37	65.8	33.5	16.4	3:15	P	3:15	F-2x	P	-22.4
	9:00	60	11	31.6	17.0						
	10:00	60	15.5	30.8	18.1						
	11:00	60	13.8	13.4	19.1					04/06/18	2x -2
	12:00	56	12.3	13.9	18.9					04/07/18	J3 .
	13:00	60	7.6	11.2	18.0						

		Connection		_	CO ppm @	CO C-1		CO CO				
Date		Source on (mins)	CO ppm @ 7% O ₂	3-hr Rolling	7% O ₂ 12- hr rolling	CO Cal Zero	Pass/Fail	CO Cal Span	Pass/Fail	OC Status	Snon Aos	tual Drift
Date	14:00	60	$\frac{(w) 7/6 O_2}{6.4}$	8.8	17.5	2.010	1 435/1 411	эран	1 433/1 411	OCSIAIUS	Span Act	
	15:00	25	8.8	7.6	17.5							
4/8/2018	15.00	37	5,4	6.9	16.6	3:15	P	3:15	F-2x	P	22.4	
7012010		60	4,6	6.3	15.5	3.13		3,13	1-24	1	22,7	
		60	4.6	4.9	14,5					04/09/18	4x	-47.6
		60	5.2	4.8	13.4					04/09/18	2x	29.4
		60	3.8	4.5	8.3					0 1/02/10	300 AS.	۰, ۲ سد
		60	1.6	3.5	7.5							
		60	1.7	2.4	6.3							
4/10/2018	9:00	41	49.7	17.7	9.3	3:15	P	3:15	F-2x	P	35.5	
1, 10, 2010	10:00	60	24.5	25.3	10.3	0.10	*	5.10	1 4.1	-	00.0	
	11:00	60	17.6	30.6	11.2							
	12:00	60	6.2	16.1	11.1							
	13:00	60	3	8.9	10.7							
	14:00	51	4.8	4.7	10.6							
4/11/2018	8:00	32	18	8.6	11.7	3:15	P	3:15	P	P	-1.6	
	9:00	60	16.5	13.1	12.7			•			•	
	10:00	60	7.9	14.1	12.9					04/12/18	P	19.6
	11:00	60	2	8.8	12.8					04/13/18	2x	-41.6
	12:00	60	9	6.3	13.4					04/14/18	P	-12.1
	13:00	60	10.7	7.2	14.2					04/15/18	P	23.4
	14:00	32	8.7	9.5	10.7							
4/16/2018	8:00	6	6.6	8.7	9.3	3:15	P	3:15	P	P	13.5	
	9:00	60	42.7	19.3	11.3							
	10:00	60	49.3	32.9	14.9							
	11:00	60	85.6	59.2	21.8							
	12:00	54	48.2	61.0	25.4							
	13:00	60	75.2	69.7	30.2							
	14:00	60	41.2	54.9	32.3							
	15:00	11	10.1	42.2	32.4							
4/17/2018	8:00	23	OFF	25.7	35.2	3:15	P	3:15	P	P	-18.6	
	9:00	54	FAULT	10.1	37.8	9:10	P	9:10	P	P	-2.2	

				CO ppm								
		_			CO ppm @							
		Source on	CO ppm	3-hr	7% O ₂ 12-	CO Cal		CO Cal				
Date	******************************	(mins)	@ 7% O ₂	Rolling	hr rolling	Zero	Pass/Fail	Span		OC Status	Span Actu	ıal Drift
	10:00	52	FAULT	#DIV/0!	40.8	15:25	P	15:25	F-2x	P	30.4	
	11:00	60	FAULT	#DIV/0!	44.9							
	12:00	60	FAULT	#DIV/0!	50.3							
	13:00	57	FAULT	#DIV/0!	51.6							
	14:00	27	OFF	#DIV/0!	52.1							
4/18/2018	8:00	28	57.7	57.7	46.5	3:25	P	3:25	F-4x	F	-50	
	9:00	60	36.1	46.9	44.1	7:20	P	7:20	F-2x	P	-24	
	10:00	60	32.9	42.2	35.6							
	11:00	60	12.8	27.3	29.9							
	12:00	60	21.4	22.4	32.2							
	13:00	60	19.9	18.0	30.1							
	14:00	22	37.9	26.4	31.2							
4/19/2018	8:00	2	()	19.3	27.3	7:20	P	7:20	P	P	-20.2	
	9:00	39	1.8	13.2	24.5							
	10:00	60	19.1	7.0	24.0					04/20/18	P	-10
	11:00	60	3.1	8.0	22.1					04/21-24/18	No cals	
	12:00	60	0.2	7.5	20.2							
	13:00	52	0	1.1	15.4							
5/15/2018	9:00	39	171.1	57.1	26.7	7:20	P	7:20	F-2x	P	32.1	
	10:00	60	34.7	68.6	26.8		05/11/18	P	-19,4	5/16/2018	P	-18.8
	11:00	60	24.8	76.9	27.8		05/12/18	2x	24.1	5/17/2018	P	7.2
	12:00	60	16.1	25.2	27.4		5/13/2018	2x	-23	5/18/2018	2x	-34.4
	13:00	60	15.9	18.9	27.1		5/14/2018	2x	32	5/19/2018	2x	36
	14:00	32	17.1	16.4	25.3							
6/6/2018	9:00	41	20.6	17.9	27.0	7:21	P	7:21	F-2x	P	36	
	10:00	60	13.3	17.0	28.0		6/1/2018	P	-17.5	6/7/2018	P	17.1
	11:00	60	23.5	19.1	28.4		6/2/2018	P	-3	6/8/2018	2x	36
	12:00	60	4.4	13.7	28.5		6/3/2018	P	0	6/9/2018	2x	29.4
	13:00	60	0.8	9.6	28.5		6/4/2018	2x	33.2	6/10/2018	þ	-17.6
	14:00	43	1.2	2.1	28.6		6/5/2018	P	0.3	6/11/2018	2x	36
6/20/2018	8:00	28	15.8	5.9	15.7	3:41	P	3:42	P	P	0	
	9:00	60	23.6	13.5	14.8	•		•				

		Source on	СО ррт	CO ppm @ 7% O ₂ 3-hr	CO ppm @ 7% O ₂ 12-	CO Cal		CO Cal				
Date		(mins)	(a) 7% O ₂	Rolling	hr rolling	Zero	Pass/Fail	Span	Pass/Fail	OC Status	Span Act	ual Drift
***************************************	10:00	60	50.5	30.0	16.9	***************************************	6/16/2018	No Cal		6/21/2018	P	12.9
	11:00	60	86	53.4	22.7		6/17/2018	No cal		6/22/2018	P	-15.8
	12:00	60	20.4	52.3	23.1		6/18/2018	2x, P	24,36	6/23/2018	P	-1.6
	13:00	60	11.9	39.4	22.7		6/19/2018	2x, P	27	6/24/2018	2x	-22.5
	14:00	60	15.4	15.9	22.2					6/25/2018	2x	-29
	15:00	35	27.9	18.4	23.5							
6/21/2018	8:00	53	15.6	19.6	22.8	3:41	P	3:41	P	P	12.9	
	9:00	60	33.2	25.6	25.2							
	10:00	54	173.8	74.2	39.6					6/22/2018	P	-15.8
	11:00	60	63.3	90.1	44.8					6/23/2018	P	-1.6
	12:00	60	10.8	82.6	44.4					6/24/2018	2x	-22.5
	13:00	60	0.2	24.8	42.4							
6/27/2018	8:00	35	6.2	5.7	38.7	3:42	P	3:42	F-2x	P	33	
	9:00	60	12.6	6.3	32.6							
	10:00	60	21	13.3	32.7					6/25/2018	2x	-29
	11:00	60	24.4	19.3	33.7					6/26/2018	P	14
	12:00	60	18.5	21.3	34.0					6/27/2018	2x	33
	13:00	60	31.9	24.9	34.3							
	14:00	57	16	22.1	34.3							
	15:00	4	18.9	22.3	33.1							
6/28/2018	8:00	47	33.9	22.9	21.5	3:42	P	3:42	Р	P	18	
	9:00	60	26.4	26.4	18.4							
	10:00	60	13.8	24.7	18.7		6/29/2018	P	20	7/1/2018	P	1.2
	11:00	60	2.2	14.1	18.8		6/30/2018	P	-16.7	7/2/2018	2x	26.2
	12:00	60	5.7	7.2	18.8					7/3/2018	2x	29
	13:00	60	3,2	3.7	18.0					7/4/2018	P	13.4
	14:00	34	5.8	4.9	16.7							
2018 Q2	Quarter Burn	Z507	Failed Cal Hours (includes	2348.0	Percent Potentially inaccurate	20.6	Test for 75% of 90%*	60.4	Description			
7/11/2018	Counts 9:00	6587	3.9	4.3	data 15.0	39.6 3:42	permit P	60.4 3:42	F-2x	eet permit crit P	36	

				CO ppm								
		C	60		CO ppm @ 7% O ₂ 12-	CO.C.I		CO Cal				
Date		Source on (mins)	CO ppm @ 7% O ₂	3-hr Rolling	hr rolling	CO Cal Zero	Pass/Fail	Span	Pass/Fail	OC Status	Span Act	ual Drift
Date	10:00	60	$\frac{(w)^{7/6} O_2}{4.6}$	4.8	13.9	2.010	7/5/2018	2x	28.1	7/10/2018	P Span Act	
								2x P				14.8
	11:00	60	5.1	4.5	11.6		7/6/2018		21	7/11/2018	P	36
	12:00	60	15.4	8.4	11.6		7/7/2018	P	6.5	7/12/2018	P	-14.6
	13:00	60 53	24.2	14.9	12.0		7/8/2018	P	-14	7/13/2018	P	-8.8
7/24/2010	14:00	52 49	4.6	14.7	9.6	2.40	7/9/2018 P	P 2.42	7.6 P	7/14/2018 P	2x	25.5
7/24/2018	7:00		41.8	23.5	10.9	3:42	Р	3:42	Р	Р	20.8	
	8:00	60	78.4	41.6	16.2		este este a la compa	r _o	2009 - 1946	********	2	20
	9:00	60	48.9	56.4	20.1		7/15/2018	Р	-7.2	7/20/2018	2x	30
	10:00	60	18.4	48.6	21.2		7/16/2018	P	006\$	7/21/2018	2x	28.8
	11:00	60	12.7	26.7	22.0		7/17/2018	P	-15.5	7/22/2018	P	0.2
	12:00	60	6.4	12.5	22.0		7/18/2018	No cal		7/23/2018	P	-2.9
	13:00	60	6.2	8.4	22.2		7/19/2018	2x	26.8			
	14:00	60	7.4	6.7	22.5							
7/25/2018	7:00	57	19.1	10.9	23.6	3:42	P	3:42	P	P	14.4	
	8:00	60	21.6	16.0	24.1					7/26/2018	P	-6.6
	9:00	60	25.2	22.0	24.2					7/27/2018	P	-9.6
	10:00	60	20.2	22.3	25.5					7/28/2018	P	-8
	11:00	54	16.7	20.7	23.4					7/29/2018	2x	34.4
	12:00	60	4.3	13.7	17.3							
	13:00	23	6.3	9.1	13.7							
7/30/2018	12:00	30	98.4	36.3	20.4	3:42	P	3:42	P	P	-2.8	
	13:00	60	47.7	50.8	23.3							
	14:00	60	37.4	61.2	25.9		7/26/2018	P	-6.6	7/31/2018	P	-1.3
	15:00	60	18.8	34.6	26.9		7/27/2018	P	-9.6	8/1/2018	P	-16
	16:00	60	13.9	23.4	27.5		7/28/2018	\mathbf{p}	-8	8/2/2018	2x	34.4
	17:00	60	10.3	14.3	26.7		7/29/2018	2x	34.4	8/3/2018	P	18.4
	18:00	33	5.9	10.0	25.4							
7/31/2018	7:00	29	83.2	33.1	30.3	3:42	P	3:42	P	P	-1.3	
	8:00	60	22.2	37.1	30.4					8/1/2018	P	-16
	9:00	60	24.6	43.3	31.1					8/2/2018	2x	34.4
	10:00	60	24.3	23.7	32.8					8/3/2018	P	18.4
	11:00	60	19.7	22.9	33.9					8/4/2018	2x	34.4

		Source on	СО ррт	CO ppm @ 7% O ₂ 3-hr	CO ppm @ 7% O ₂ 12-	CO Cal		CO Cal				
Date		(mins)	(a) 7% O ₂	Rolling	hr rolling	Zero	Pass/Fail	Span	Pass/Fail	OC Status	Span Act	ual Drift
	12:00	60	8.9	17.6	26.4					8/5/2018	2x	34.4
	13:00	11	11.7	13.4	23.4					8/6/2018	P	19.1
9/5/2018	7:00	28	141.6	54.1	32.1	3:42	P	3:42	P	P	9.8	
	8:00	60	198.4	117.2	47.1							
	9:00	60	55.2	131.7	50.5		9/1/2018	P	6.6	9/6/2018	P	13.6
	10:00	60	26	93.2	51.8		9/2/2018	P	13.4			
	11:00	60	8.1	29.8	52.0		9/3/2018	2x	28.4			
	12:00	60	17.3	17.1	46.5		9/4/2018	P	-5.6			
	13:00	60	18	14.5	46.2							
	14:00	16	23.4	19.6	46.1							
9/7/2018	8:00	12	118.4	53.3	53.9	3:43	P	3:43	F-2x	P	-43.5	
	9:00	60	49.6	63.8	56.4							
	10:00	60	66.7	78.2	61.2		09/06/18	P	13.6	9/8/2018	2x	33.8
	11:00	60	13.2	43.2	61.3					9/9/2018	p	6.4
	12:00	60	9.5	29.8	50.3					9/10/2018	2x	-24.9
	13:00	60	21.7	14.8	35.6							
	14:00	60	16.7	16.0	32.4							
	15:00	60	8	15.5	30.9							
	16:00	60	8.9	11.2	31.0							
	17:00	4	5	7.3	29.9							
9/11/2018	9:00	46	21.1	11.7	30.2	3:43	P	3:43	P	P	14.6	
	10:00	60	4.8	10.3	28.6							
	11:00	60	9.8	11.9	19.6					9/12/2018	2x	-23.7
	12:00	60	1.9	5.5	15.6							
	13:00	60	0.9	4.2	10.1							
	14:00	19	0.4	1.1	9.1							
9/13/2018	9:00	26	1.4	0.9	8.4	3:43	P	3:43	P	Р	17	
	10:00	60	0.1	0.6	6.6							
	11:00	60	0.1	0.5	5.2					9/14/2018	Þ	5.8
	12:00	60	6.9	2.4	5.1					9/15/2018	P	18.4
	13:00	60	11.3	6.1	5.3					9/16/2018	\mathbf{p}	21.2
	14:00	56	12.8	10.3	6,0					9/17/2018	p	-16.8

		Source on	CO ppm	3-hr	CO ppm @ 7% O ₂ 12-	CO Cal	D /E *3	CO Cal	D /E ''	000	0 1	170.14
Date		(mins)	@ 7% O ₂	Rolling	hr rolling	Zero	Pass/Fail	Span	Pass/Fail		Span Act	ual Drift
9/18/2018	9:00	58	53.8	26.0	8.7	3:43	P	3:43	P	P	-14.6	
	10:00	60	23.2	29.9	10.2							
	11:00	60	13.1	30.0	10.5					9/19/2018	p	11.4
	12:00	60	26.6	21.0	12.6					9/20/2018	No cal	
	13:00	24	16.6	18.8	13.9							
9/21/2018	8:00	32	FAULT	21.6	15.1	No calibra	ation occurred					
	9:00	13	Off	16.6	16.5							
	10:00	58	Cal	#DIV/0!	18.3							
	11:00	49	46.7	46.7	23.4							
	12:00	60	12.8	29.8	24.1							
	13:00	5	3.2	20.9	23.2							
9/25/2018	10:00	34	6.5	7.5	22.5	3:44	P	3:49	P	P	-6.6	
	11:00	60	2.4	4.0	16.8		9/22/2018	2x	34.4	9/26/2018	2x	-24.8
	12:00	60	22.4	10.4	16.7		9/23/2018	P	-0.4	9/27/2018	2x	22.9
	13:00	38	136.3	53.7	30.4		9/24/2018	Р	-5.6	9/28/2018	P.2x.P.2x.P	-16.4,- 40.5,- 43.6.15.4
2018 Q3	Quarter Burn Counts	4063	Failed Cal Hours (includes 2x)	815.0	Percent Potentially inaccurate data	20.1	Test for 75% of 90%* permit	79.9	Meets perm			,
10/2/2018	9:00	49	95.9	84.9	38.1	3:39	P	3:39	Р	P	0.4	
	10:00	60	41.8	91.3	40.9	7:29	P	7:29	F-2x	P	27.9	
	11:00	60	32.9	56.9	40.1		9/29/2018	4x	-46.6	10/12/2018	P	11.4
	12:00	60	24.9	33.2	38.7		9/30/2018	p	21.4	10/13/2018	2x	-32.1
	13:00	60	2.2	20.0	35.7		10/1/2018	2x	-39.6	10/14/2018	2x	-22.4
	14:00	60	3.7	10.3	32.1		10/03-08/18	P	All good	10/15/2018	2x.	33.4
									34.4,-			
	15:00	8	1.6	2.5	31.2		10/9-11/18	2x	44,33.2	10/16/2018	p	-14.2
11/16/2018	8:00	24	136.4	47.2	42.3	17:00	P	17:00	F-2x	P	-40.4	
	9:00	60	35.4	57.8	44.7		11/8/2018	4x	-54.5,-7.9	11/17/2018	P	1,1
	10:00	60	60.8	77.5	49.5		11/12/2018	2x	34.3	11/18/2018	4x	-45.7

Date		Source on (mins)	CO ppm @ 7% O ₂	CO ppm @ 7% O ₂ 3-hr Rolling	CO ppm @ 7% O ₂ 12- hr rolling	CO Cal Zero	Pass/Fail	CO Cal Span	Pass/Fail	OC Status	Span Ac	etual Drift
			***************************************									-79.9,-
	11:00	60	90.1	62.1	55.2		11/13/2018	2x	28.5	11/19/2018	, , ,	39.3,39.3,-
	12:00	60	28.6	59.8	46.2		11/14/2018	P	-5.9 9.7,-	11/20/2018		25.7,-5.7,- 15.4,-2.4
							11/15/2018	o o o o o	16.6,21.8, 24.7	11/21/2018	2x	-27
12/13/2018	8:00	39	17.5	45.4	39.7	7:25	P	7:25	P	P	0.5	<i>~~~.</i> 1
12/15/2010	9:00	60	15.4	20.5	37.5	7,23	11/22/2018	4 _x	-54.4	11/30/2018		1.5,-3.3
	10:00	60	28.6	20.5	37.1		11/23/2018	2x	32.4	12/01-05/18		-5
	11:00	60	87.9	44.0	42.4		11/24/2018	P	5.3	12/6/2018	2x	28.2
												-12.1,-
	12:00	60	66.1	60.9	47.7		11/25/2018	2x	39.3	12/07-09/18	P	5.1,12.9
									15.3			
								P,4x,2x,4	51.5,25.3,-			
	13:00	60	27.2	60.4	49.6		11/26/2018	X	58.5	12/10/2018	4x	-52.9
	14:00	60	36.3	43.2	52.5		11/27/2018	P,2x	4.7,23.1	12/11/2018	2x	27.9
	15:00	60	53	38.8	45.6		11/28/2018	2x	-27.1	12/12/2018	P	9.8
	16:00	60	1.4	30.2	42.7		11/29/2018	2x	-37.2			
	17:00	10	0.2	18.2	37.7							
12/14/2018		23	Off	0.8	32.9	7:25	P	7:25	F-2x	P	-43	
		0	Off	0.2	33.4					12/15/2016	No Cal	
		0	Off	#DIV/0!	35.1			*******************************		12/16/2016	No Cal	**************************************
12/17/2018	14:00	33	11.5	11.5	34.7		ons between 09	0:29-11:11	; three failed	. B.		
	15:00	60	27.7	19.6	34.6	on the last	cal			15.7	29	33.9
	16:00	60	38	25.7	29.0					22,6	10.2	
	17:00	29	19.7	28.5	23.9							
12/18/2018	8:00	58	20.6	26.1	23.2	0:41	P	0:41	P	P	-18.4	
	9:00	60	10.3	16.9	20.3						_	
	10:00	60	10.7	13.9	15.6					12/19/2018	2x	31.3

		Source on	СО ррт	CO ppm @ 7% O ₂ 3-hr	CO ppm @ 7% O ₂ 12-	CO Cal		CO Cal				
Date		(mins)	$@7\% O_2$	Rolling	hr rolling	Zero	Pass/Fail	Span	Pass/Fail	OC Status	Span Ac	ctual Drift
	11:00	60	10.2	10.4	16.5					***************************************	***************************************	***************************************
	12:00	60	16.9	12.6	18.4							
	13:00	60	13.9	13.7	18.0							
	14:00	59	14.1	15.0	17.6							
12/20/2018		19	Off	14.0	17,6	0:41	P	0:41	F-2x	P	27.3	
		60	FAULT	14.1	18.2	8:21	P	8:21	P	P	18.3	
												-2.3,22.1,-
		13	Off	#DIV/01	17.2				1	2/21-23/2018	P	17.3
		0	Off	#DIV/0!	14.6					12/24/2018	2x	-38.8
		0	Off	#DIV/0!	13.8					12/25/2018	4x	-53,2
	12:00	8	2.4	2.4	11.2					12/26/2018	2x	-41.8
												10.4,-19.8
	13:00	60	1.6	2.0	10.0					12/27/2018	$P_{*}P_{*}P$	14.5
	14:00	60	1.7	1.9	8.7					12/28/2018	4x	-59,4
	15:00	34	2.5	1.9	7.6							
			Failed Cal		Percent							
2018 Q4	Quarter		Hours		Potentially		Test for 75%					
2010 Q 1	Burn		(includes		inaccurate		of 90%*					
	Counts	2026	2x)	380.0	data	18.8	permit	81.2	Meets pern	nit Criteria		
2018 Year Total	Year Burn	23326	Total Source on with Cal	3723.0	Percent Potentially inaccurate	16.0	Test for 75% of 90%*					
	counts		Failure		data		permit	84.0	Meets pern			
1/9/2019	10:00	55	135.5	46.6	24.5	3:11	P	3:12	P	P	-91.1	
	11:00	60	239.5	125.8	56.8							
	12:00	60	44	139.7	61.0		01/01-06/19	4x	all >-189	1/13/2018	4x	-64.7
	13:00	60	43.4	109.0	58.8		1/7/2019	P	-0.3	1/14/2018	P	-2.1
	14:00	60	46.5	44.6	57.5		1/8/2019	No cal		1/15/2018	4x	-58.8
	15:00	60	19.1	36.3	53.6		1/10/2019	2x	-24.2	1/16/2018	P	-4.8
	16:00	1	15.9	27.2	50.2		1/11-12/2019	P	-12,-21.4	1/17/2019	4x	-93.5
2/5/2019	9:00	30	128.8	54.6	56.7	3:13	P	3:13	F-4x	F	2/1/2018	-93.8

		Source on	СО ррт	CO ppm @ 7% O ₂ 3-hr	CO ppm @ 7% O ₂ 12-	CO Cal		CO Cal				
Date		(mins)	(a) 7% O ₂	Rolling	hr rolling	Zero	Pass/Fail	Span	Pass/Fail	OC Status	Span Actu	ıal Drift
	10:00	60	62.4	69.0	61.7	7:25	P	7:25	F-2x	P	2/2/2018	29.6
	11:00	31	26.5	72.6	63.8	7:48	P	7:48	P	P	2/3/2018	-4.9
	12:00	31	FAULT	44.5	69.5		02/01-09/19	4x 3 times	, 2x 1		2/4/2018	30.5
2/13/2019	10:00	58	FAULT	26.5	76.2	7:48	P	7:48	F-2x	P	31.2	
	11:00	60	FAULT	#DIV/0!	69.6							
	12:00	60	34.7	34.7	46.8		2/10/2019	2x	~38.8	2/14/2019	2x	27.4
	13:00	60	50.7	42.7	47.6		2/11/2019	P	-7.1	2/15/2019	2x	-28
	14:00	60	21.1	35.5	45.1		2/12/2019	2x	31.2	2/16/2019	No cals	
	15:00	46	27.7	33.2	43.0							
3/5/2019	9:00	20	Off	24.4	46.0	no calibra	tion occurred					
	10:00	60	FAULT	27.7	50.3							
	11:00	60	FAULT	#DIV/0!	37.2		03/01-04/19	and 03/06-	10/19 No cal	ls occurred		
	12:00	48	327	327.0	81.3							
	13:00	0	FAULT	327.0	92.2							
3/20/2019	9:00	46	137.8	232.4	99.8	7:50	Р	7:50	P	P	0	
	10:00	60	17.5	77.7	88.1	Initially n	o data provide	d. after add	ditional reco	rds request, go	ot data.	
	11:00	60	80.3	78.5	87.1	03/01/19-	03/18/19 No C	alibration	Occurred.			
	12:00	60	74.8	57.5	92.1	03/19/19	07:59 P and 07	':59 2x	23.5			
	13:00	60	61.2	72.1	93.4	03/21/19	No Calibration	Occurred				
	14:00	60	4.1	46.7	91.3	03/22/19	Cals passed		0			
	15:00	60	3	22.8	88.2	03/23-31/	19 No calibrati	on occurre	d			
	16:00	2	0	2.4	78.4							
2019 Q1	Quarter Burn Counts	1448	Failed Cal Hours (includes 2x)	344,0	Percent Potentially inaccurate data	23.8	Test for 75% of 90%* permit	76.2	Meets perm	nit Critoria		
4/17/2019	7:00	7	327.7	110.2	103.3	7:51	F-2x	7:51	F-2x	Р	24.7	
T/ 1 / / 2017	8:00	60	49.1	125.6	98.4		o data provide			_		
	9:00	60	106.4	161.1	78.4	munany ir	o anna hininne	ie. ittemi itti	GENTLE SERVICE	ius ivquest, gi	JE WHIII.	
	10:00	60	82.5	79.3	78.7		4/13/2018	No cal		4/16/2019	No cal	
	11:00	60	82.3	90.4	74.1		4/14/2018	No cal		4/18/2019	No cal	
	12:00	60	9.1	58.0	73.4		4/15/2018	No cal		4/19/2019	2x	-27.3

				CO ppm	-						
					CO ppm @						
		Source on	CO ppm	3-hr	7% O ₂ 12-	CO Cal		CO Cal			
Date		(mins)	@ 7% O ₂	Rolling	hr rolling	Zero	Pass/Fail	Span	Pass/Fail	OC Status	Span Actual Drift
	13:00	60	3.4	31.6	67.0						
	14:00	60	1.5	4.7	60.9						
	15:00	60	0.2	1.7	55.8						
4/23/2019	8:00	48	203.1	68.3	72.4	7:51	F-2x	7:51	P	P	3.8
	9:00	60	48	83.8	76.1	Initially no	data provide	d. after add	ditional reco	rds request, go	ot data.
	10:00	60	83.3	111.5	83.1	Also d	idn't pass 5%	on zero			
	11:00	60	33.1	54.8	58.5	This was the	ne day of the i	failed RAT	A (102.4%)		
	12:00	60	7.7	41.4	55.1						
	13:00	60	2.9	14.6	46.4						
	14:00	60	0	3.5	39.6						
	15:00	60	0	1.0	32.7						
	16:00	2	0	0.0	31.9						
4/24/2019	9:00	52	127	42.3	42.2	7:51	F-2x	7:55	F-2x	Р	-29.5
	10:00	60	206.6	111.2	59.3	8:15	F-2x	8:15	F-4x	F	-54
	11:00	60	40.9	124.8	62.7	8:55	P	8:55	P	P	6.8
	12:00	60	9.8	85.8	46.6	Initially no	data provide	d. after add	ditional reco	rds request, go	ot data.
	13:00	60	7.4	19.4	43.2	Also d	idn't pass 5%	on zero			
	14:00	60	3.3	6.8	36.6						
	15:00	12	1.1	3.9	33.9						
4/25/2019	8:00	51	1.3	1.9	33.4	8:55	P	8:55	F-2x	P	-27.8
	9:00	60	1.1	1.2	33.2	Initially no	data provide	d. after ade	ditional reco	rds request, go	ot data.
	10:00	60	4.5	2.3	33.6						
	11:00	60	0.6	2.1	33.6						
	12:00	60	4.3	3.1	34.0						
	13:00	60	4	3.0	23.7						
	14:00	60	4.8	4.4	6.9						
	15:00	3	0.4	3.1	3.6						
	16:00	0	Off	2.6	3.0						
5/15/2019	9:00	57	139.9	70.2	15.0	8:16	P	8:16	Р	P	16.2
	10:00	60	0	70.0	14.7		data provide	d. after add	ditional reco	rds request, go	
	11:00	60	0	46.6	14.6	¥* *****	1			x / 42/11	
	12:00	60	0.2	0.1	14.5						

Date		Source on (mins)	CO ppm @ 7% O ₂	CO ppm @ 7% O ₂ 3-hr Rolling	CO ppm @ 7% O ₂ 12- hr rolling	CO Cal Zero	Pass/Fail	CO Cal Span	Pass/Fail	OC Status	Span Actual Drift
	13:00	60	0	0.1	14.4			***************************************	***************************************		
	14:00) Januari Ja Ja Ja Ja Ja Ja Ja Ja Ja Ja Ja Ja Ja	0	0.1	14.0						
6/26/2019	9:00	50	FAULT	0.0	15.4	10:35	P	10:35	P	P	19.9
	10:00	60	53.6	26.8	20.3	Initially n	o data provided	l. after add	ditional reco	rds request, g	ot data.
	11:00	60	45.7	49.7	24.5	They have	e only been doi:	ng cals on	burn		
	12:00	60	20.2	39.8	26.0	days but f	for some reason	cal'd 06/0	4/19,	6/25/2019	>-182 all
	13:00	60	12.9	26.3	27.3	06/21,24-	30/19 and 07/0	1-02/19			
	14:00	15	29.2	20.8	27.4	16 cals or	n 06/25/19				
6/27/2019	6:00	27	Off	21.1	16.2	3:35	F-4x	3:35	F-2x	F	32.5
	7:00	49	Drift	29.2	18.0	Initially n	o data providec	l. after ad	ditional reco	rds request, g	ot data.
	8:00	60	Drift	#DIV/0!	20.2	Month of	July, basically	no cals oc	curred excep	of the 1st and 1	2nd
	9:00	58	Drift	#DIV/0!	23.1		06/28/18	2x	-42.4		
	10:00	60	Drift	#DIV/0!	26.9		06/29/18	4x	-50		
	11:00	60	Drift	#DIV/0!	32.3		06/30/18	2x	34.1		
	12:00	5	Off	#DIV/0!	32.3						
2019 Q2	Quarter Burn		Failed Cal Hours (includes		Percent Potentially inaccurate		Test for 75% of 90%*				
- 1 - 1 - 1 - 1 - 1	Counts	2657	2x)	2650.0	data	99.7	permit	0,3	<u> </u>	eet permit cri	
8/6/2019	8:00	7	16.2	16.2	24.8	3:37	Р	3:37	P	P	20.7
	9:00	60	18.9	17.6	19.5	•	o data provided		litional reco	rds request, g	ot data.
	10:00	58	189.5	74.9	53.3	No cals 0	7/03/19 - 08/05	/19			
	11:00	60	24.2	77.5	55.6						
	12:00	60 7. i	58	90.6	61.4						
	13:00	56	49	43.7	59.3						
	14:00	53	135.4	80.8	70.2						
	15:00	60	33.6	72.7	65.6						
	16:00	60	32.4	67.1	61.9						
	17:00	60	21.5	29.2	57.9						
	18:00	57	10.6	21.5	53.6						
	19:00	1	9.6	13.9	49.9						
8/7/2019	7:00	0	Off	10.1	53.0	Initially n	o data provided	 after ad- 	ditional reco	rds request, g	ot data.

Date		Source on (mins)	CO ppm @ 7% O ₂	CO ppm @ 7% O ₂ 3-hr Rolling	CO ppm @ 7% O ₂ 12- hr rolling	CO Cal Zero	Pass/Fail	CO Cal Span	Pass/Fail	OC Status	Span Actual Drift
	8:00	12	84.7	47.2	59.0	No calibra	ition occurred				***************************************
	9:00	60	2.4	43.6	41.9						
	10:00	60	4.1	30.4	40.1						
	11:00	60	6.9	4.5	35.5						
	12:00	60	18.6	9.9	32.7	No calibra	ition occurred (08/07/19-1	1/30/19		
	13:00	60	182.3	69.3	37.0						
	14:00	55	162.5	121.1	48.7						
2019 Q3	Quarter Burn Counts	959	Failed Cal Hours (includes 2x)	959.0	Percent Potentially inaccurate data	100.0	Test for 75% of 90%*	0.0	Does not m	eet permit cri	teria
12/2/2019	12:00	36	0	114.9	45.7		New Analyzer		1-000		••••
	13:00	60	0	54.2	43.8	• **	New Analyzer				
	14:00	60	0	0.0	42.8	- L	New Analyzer				
	15:00	60	0	0.0	42.0		New Analyzer				
	16:00	60	0.4	0.1	38.5		New Analyzer				
	17:00	32	0.9	0.4	31.5		New Analyzer				
12/3/2019	17:00	31	37	12.8	34.4		New Analyzer		***************************************		
12/4/2019	9:00	28	4.3	14.1	34.4	9:54	P	9:57	F-4x	Setting up No	w Analyzer
	10:00	25	Off	20.7	36.9	13:44	P	13:47	F-4x	Setting up No	-
	11:00	42	CAL	4.3	38.7	14:28	P	14:32	F-4x	Setting up No	
	12:00	4	Off	#DIV/0!	22.8	Setting up	New Analyzei	•		~ ^	~
	13:00	60	Drift	#DIV/0!	5.3	Setting up	New Analyzer		12/05/19 13	2 cals 6 4x and	d 6 P
	14:00	37	Drift	#DIV/0!	6.1	Setting up	New Analyzer	•			
12/6/2019	10:00	32	4.6	4.6	6.7	14:40	P	14:40	F-4x	Setting up No	ew Analyzer
	11:00	46	115.6	60.1	23.3	14:52	P	14:52	F-4x	Setting up No	w Analyzer
	12:00	53	58.8	59.7	31.7	Setting up	New Analyzei	•		~ ~	·
	13:00	60	877.3	350.6	156.9		New Analyzer				
	14:00	24	2209.1	1048.4	472.4	40	New Analyzer				
2/12/2019	10:00	29	4929.8	2672.1	1171.4		e 21 CALS do		e, no	Setting up Ne	ew Analyzer
	11:00	60	2128.8	3089.2	1474.9		nalyzer was be			Setting up No	-
	12:00	60	557.5	2538.7	1360.2	failed, but	the final four	passed		Setting up No	ew Analyzer

		Source on	СО ррт	CO ppm @ 7% O ₂ 3-hr	CO ppm @ 7% O ₂ 12-	CO Cal		CO Cal			
Date		(mins)	$@7\% O_2$	Rolling	hr rolling	Zero	Pass/Fail	Span	Pass/Fail	OC Status	Span Actual Drift
***************************************	13:00	60	CAL	1343.2	1360.2	14:06-14:3	35 were the fian	l passing	ones	Setting up Ne	w Analyzer
	14:00	49	239.9	398.7	1235.7					Setting up Ne	w Analyzer
12/13/2019	10:00	23	2517.1	1378.5	1363.9	Setting up	New Analyzer	N:	o data provio	led	
	11:00	16	550.1	1102.4	1289.9	Setting up	New Analyzer	N	o data provid	led	
	12:00	3	388.4	1151.9	1324.8	Setting up	New Analyzer	N	o data provid	led	
12/17/2019	6:00	2	0	312.8	1314.3	No data pi	rovided				
	7:00	59	0	129.5	1308.9	No data pi	ovided				
	8:00	60	0	0.0	1229.2	No data pi	ovided				
	9:00	48	0	0.0	1028.3	No data pi	rovided				
	10:00	52	0	0.0	580.2	No data pi	ovided				
	11:00	60	17.3	5.8	388.2	No data pi	ovided				
	12:00	60	12.5	9.9	338.7	No data pi	ovided				
	13:00	55	42.8	24.2	314.0	No data pi	ovided				
	14:00	39	9.8	21.7	294.8	No data pr	rovided				
			Failed Cal		Percent						
2019 Q4	Quarter		Hours		Potentially		Test for 75%				
2019 Q4	Burn		(includes		inaccurate		of 90%*				
	Counts	1485	2x)	1485.0	data	100.0	permit *	0.0	Does not m	eet permit crit	eria
			Total		Percent						
2019 Year	Year	11613	Source on	5438.0	Potentially	46.8	Test for 75%				
Total	Burn	11013	with Cal	2420.0	inaccurate	70.0	of 90%*				
	Counts		Failure		data		permit	53.2	Does not m	eet permit crit	eria
1/22/2020	8:00	58	Drift	26.3	92.8	17:50	P	17:50	P	P	0.2
	9:00	60	34.3	22.1	45.9						
	10:00	31	40.7	37.5	14.3						
	11:00	60	84.1	53.0	22.0						
	12:00	48	558.2	227.7	72.7						
	13:00	60	27.6	223.3	75.2						
	14:00	55	122	235.9	86.3						
	15:00	5	00	49.9	86.3						
2/27/2020	7:00	14	304.9	142.3	112.4	7:31	P	7:31	P	P	-0.3
	8:00	60	10.9	105.3	112.3						

				CO ppm					***************************************		
				~	CO ppm @						
		Source on	CO ppm	3-hr	$7\% O_2 12$ -	CO Cal		CO Cal			
Date		(mins)	@ 7% O ₂	Rolling	hr rolling	Zero	Pass/Fail	Span	Pass/Fail	OC Status	Span Actual Drift
	9:00	60	105.8	140.5	118.0						
	10:00	60	92	69.6	125.5						
	11:00	60	36.3	78.0	118.1						
	12:00	60	19.6	49.3	116.8						
	13:00	60	16.3	24.1	114.8						
	14:00	60	18.5	18.1	109.3						
	15:00	58	16.1	17.0	64.2						
	16:00	4	40.9	25.2	65.3						
4/21/2020	13:00	9	104.5	53.8	63.8	7:01	P	7:01	P	P	-0.3
	14:00	53	187.8	111.1	79.5						
	15:00	60	9.5	100.6	54.9						
	16:00	52	40.6	79.3	57.3						
	17:00	58	25.8	25.3	50.7						
4/22/2020	8:00	59	11.9	26.1	44.0	7:14	P	7:14	P	P	0.2
	9:00	57	226.6	88.1	59.8						
	10:00	60	9.6	82.7	59.0						
	11:00	60	6.2	80.8	58.2						
	12:00	60	13.1	9.6	57.7						
	13:00	60	8.5	9.3	57.1						
	14:00	49	8.5	10.0	54.4						
5/7/2020	9:00	6	Off	8.5	49.8	9:37	P	9:37	P	P	-1.3
	10:00	60	197.2	102.9	50.7						
	11:00	60	20.6	108.9	51.7						
	12:00	60	19.9	79.2	49.8						
	13:00	60	10.2	16.9	48.4						
	14:00	60	7.9	12.7	48.0						
	15:00	60	6	8.0	28.0						
	16:00	17	4.7	6.2	27.5						
5/12/2020	8:00	30	348.7	119.8	58.7	11:44	P	11:45	P	P	-1.3
	9:00	60	15.5	123.0	58.9						
	10:00	60	13.8	126.0	59.4						
	11:00	60	21.9	17.1	60.6						

				CO ppm @ 7% O ₂	CO ppm @						
Date		Source on (mins)	CO ppm @ 7% O ₂	3-hr Rolling	7% O ₂ 12- hr rolling	CO Cal Zero	Pass/Fail	CO Cal Span	Pass/Fail	OC Status	Span Actual Drift
	12:00	60	20.2	18.6	57.2						
	13:00	60	19.9	20.7	42.4						
	14:00	60	3.6	14.6	41.0						
	15:00	60	4.5	9.3	39.7						
	16:00	33	1	3.0	39.0						
6/3/2020	9:00	60	36.7	Don't	36.7	7:54	P	7:54	P		0.7
	10:00	60	118.4	have	77.6	8:01	P	8:01	P		
	11:00	60	36.9	data	64.0						
	12:00	60	28.2	for this	55.1						
	13:00	60	44.5		52.9						
	14:00	60	77.3		57.0						
	15:00	20	22.4		52.1						
6/4/2020	10:00	15				No calibra	tion occurred				
	11:00	60	T8!e	lana data	Com Main						
	12:00	60	1 1JOH I	have data	or mis						
	13:00	0									

Key Data in Black sohowed up on both Hourly Emssions Report and Rolling averages Report
Data in Red showed up on Rolling Averages Report, but not Hourly Emissions Report
Data in Green showed up on Hourly Emission Report, but not Rolling Averages Report
Data in Blue is information and notes

^{*}This is not actual "out-of-control' data, but shows data that could be called into question for accuracy based on the 2x failure.



Inspection Report Tracking ID: PC1812-093

Source: Tucson Iron and Metal

Permit #: 127

Location: 4484 E. Tennessee Street, Tucson, AZ

Date: December 20, 2018 **Arrival Time:** 10:00 am **Departure Time:** 11:00 am

Inspectors: Dustin Fitzpatrick, Rupesh Patel **Spoke With:** Caitlin Goldsmith, Dan Butwinski

Phone #: (520) 748-1900

Reason for Inspection: Complaint

Rupesh Patel and I arrived at the front of the facility on Tennessee Street and observed black smoke rising from the rear of the facility in the area of the Other Solid Waste Incinerator (incinerator). We checked in at the front office and conducted inspection rights protocol with Caitlin Goldsmith (Attachment 1). We informed her that the Pima County Department of Environmental Quality (PDEQ) received a complaint regarding black smoke from the incinerator that occurred the prior week. She did not indicate that any abnormal incinerator operations occurred the week prior.

We walked to the incinerator area and met with the incinerator operator, Dan Butwinski. The amount of black smoke we had observed upon arrival at the facility had lessened. We informed him that PDEQ received a complaint of black smoke from the incinerator the prior week and advised that we observed heavier black smoke in the vicinity when we arrived at the business. He informed us that the incinerator unit has just experienced an issue causing reduced air draw and resultant smoke when we had arrived, which had corrected. There was still intermittent black smoke emitting at regular intervals from the opening of the incinerator (Attachment 2, Photos 1-2). We walked to the sorbent injection apparatus and observed a moderate amount of white sorbent powder on the ground that was escaping from the associated fan blower (Attachment 2, Photo 3).

Mr. Butwinski then informed us that the incinerator unit was producing smoke during the burn that occurred the prior week on Thursday, December 13th. He relayed that he physically went through the system ducting on Saturday, December 15th, and found a large hole approximately 1' x 2' on the top of the southwest portion that had rusted and collapsed (Attachment 2, Photo 4). He said that a manlift was used Monday morning, December 17th, to repair the duct, and that smoke emissions were not significant during the burned that occurred on Monday and Tuesday, December 17th and 18th.

The continued intermittent smoke emissions from the incinerator opening appeared to be above the permitted 10% opacity limitation, so I positioned myself to the southeast of the unit with the sun to my back and conducted an EPA Alt-082 visible emission observation utilizing my tripod,

intervalometer, and Canon PowerShot SX60 HS digital camera (Attachment 2, Photos 5-8). Mr. Butwinski conveyed that after fixing the hole in the ducting, he has continued to notice less draw of air through the system compared to past operations, and said he planned to inspect the integrity of the baghouse housing to evaluate whether there is additional leakage of ambient air into the system after they current day's burn.

Following the conclusion of the emission observation, I went to the baghouse panel and observed that the photohelic gauge was reading near 6" H₂O (Attachment 2, Photo 9). Mr. Butwinski said the baghouse system would pulse when the pressure reached the upper setting limit of 6" H₂O. We went to the incinerator operator's booth and observed the monitoring screen, which indicated that the baghouse pressure was 5.9" H₂O (Attachment 2, Photo 10). The CEMS Excel form for the day's burn indicated that the baghouse pressure started at 4.3" H₂O at the beginning of the burn (Attachment 2, Photo 11). Mr. Butwinski inputted a manual pulse to the system, which shortly afterward reduced the baghouse pressure to 2.3" H₂O. The airflow into the incinerator front opening visibly increased after the baghouse pressure reduction and black smoke was no longer emitting.

I advised Mr. Butwinski that a deficiency of the air permit requirement to draw all emissions from the incinerator through the emissions control systems was observed due to visible emissions exiting the front opening of the incinerator. We checked back in at the front office with Ms. Goldsmith and I let her know that I would advise her of the opacity results of the EPA Alt-082 visible emission observation and provide a copy of the inspection report within 30 working days. I also requested to reinspect the facility during the next scheduled burn, which she relayed to be planned for January 9, 2019, to observe the incinerator for smoke emissions and to look at any air leak repairs made to the ducting and/or baghouse housing.

Following the inspection, I submitted and received results for DOCS II analysis of the EPA Alt-082 visible emission observation of 23.542% opacity. I emailed Ms. Goldsmith and Mr. Kippur to inform them of the opacity results and to request records of the daily incinerator burn logs from the current and previous weeks. I also advised that PDEQ received the results of the annual performance test indicating that the OSWI unit failed to demonstrate compliance with the sulfur dioxide emission limitation and to inquire about the status of retesting the unit (Attachment 4). The burn logs and associated records were provided the following day (Attachment 5).

The Daily Operators Log for Incinerator dated Thursday, December 13, 2018, had the work "YES" circled to indicate that visible emissions were present during the first and second four hours of the burn, as well as a comment written, "Visible Emission during burn. Looks like duct work may have failed. Will inspect duct work when system cools down." The log for Friday, December 14, 2018, also had the word "YES" circled for visible emissions present and a comment written, "CEM not available due to calibration. Power failure visible emissions, will inspect duct work when system cools." The log for Monday, December 17, 2018, had the word "NO" circled for visible emissions present and a comment written, "Inspected duct work on Saturday 12.15 and found a hole in cooling tower. Repaired hole in duct work on 12/17. Repairs completed." The log for Tuesday, December 18, 2018, had the word "YES" circled for visible emissions present and did not have any comments written. The log for Thursday, December 20, 2018, had the word "YES" circled for visible emission visible today.

Possible leak in baghouse. Will inspect and repair before next burn on 1/9/19."

The CEMS Hourly Emissions and Rolling AVG Emission Reports provided for December 14, 2018, indicate that the incinerator is not operating between the hours of 00:00 and 04:00 yet the CO @ 7% 12-HOUR ROLL AVG (PPM) is recorded as decreasing from 23.6 to 0.2 during the time period (Attachment 6). Permit condition 56.b instructs, "You must continuously monitor carbon monoxide emissions to determine compliance with the carbon monoxide emissions limitation. Twelve-hour rolling average values are used to determine compliance. A 12-hour rolling average value above the carbon monoxide emission limit in table 1 of condition 51 constitutes a deviation from the emission limitation." The carbon monoxide emission limit in table 1 of condition 51 requires using the averaging time of 12-hour rolling averages measured using CEMS, calculated each hour as the average of the previous 12 operating hours. The 12-hour rolling averages from the CEMS recorded in the Excel spreadsheets do not appear to be calculated using only the previous 12 operating hours.

Upon review of the inspection findings, and pattern of noncompliance, PDEQ has determined a Notice of Violation will be issued to Tucson Iron and Metal for deficiencies of permit conditions 51.d, 51.e, and 73.

Attachments:

- 1. Inspection Rights form dated December 20, 2018
- 2. Inspection Photo Log dated December 20, 2018
- 3. DOCS II Report
- 4. Bison Test Results
- 5. Incinerator Burn Logs
- 6. CEMS data for December 14, 2018



PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY 33 N. Stone Avenue, Suite 700, Tucson, AZ 85701-1429

Phone (520) 724-7400 FAX (520) 838-7432 http://webcms.pima.gov/government/environmental_quality/

AIR PROGRAM NOTIFICATION OF INSPECTION RIGHTS

SOURCE INFORMATION

PC# 1812-093	Permit # / 2 7
Regulated Person TUCSON IRON & METAL	
On-site Representative CAITUIN GOLDS TH	Title 6FFIX MOR
Site Location 4484 ETENNESSEE ST	
Site Contact 6ANY KIPPUR E-Mail	
Mailing Address	
PDEOINFORMATION	
Inspector Name D.F ITZPATRICK	Phone (520) 724-7372
Inspection Date /2/20/18	
Accompanied by . PATEL	
Questions or comments on these procedures, your inspection and du directed to the Pima County Department of Environmental Quality (at (520) 724-7400. While I have the right to decline to sign this for still proceed with the inspection under Pima County Code (PCC) 17.2	PDEQ) inspector listed on this form m, the PDEQ representative(s) may
☐ I acknowledge that I have read and understand the Inspection R	ights on the back of this form.
Signature Cully Holdsmith	Date 12/20/18
	Refused to sign the Notification.
Authorized on-site representative is not present at the facility.	

Pima County Department of Environmental Quality Air Program

Site Location: 4484 E. Tennessee St., Tucson, AZ

Dates: December 20, 2018

Photographic Log

Tracking #: PC1812-093
Photographer: D. Fitzpatrick





2.

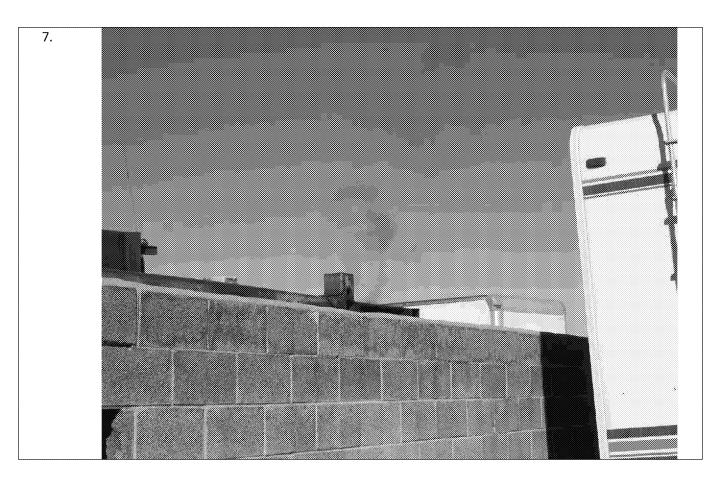




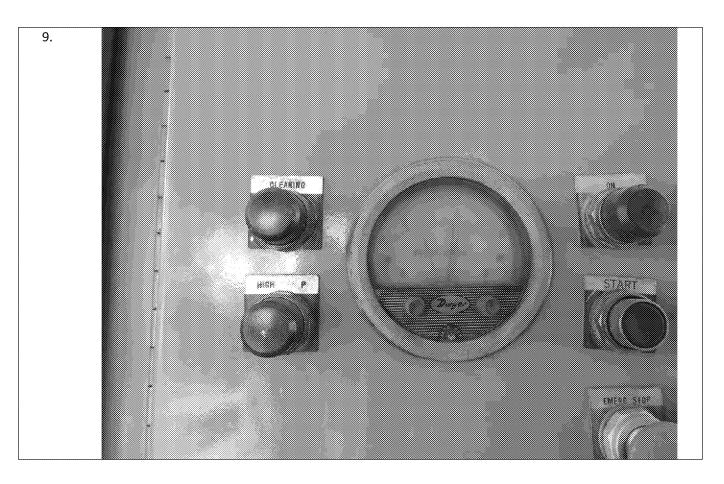


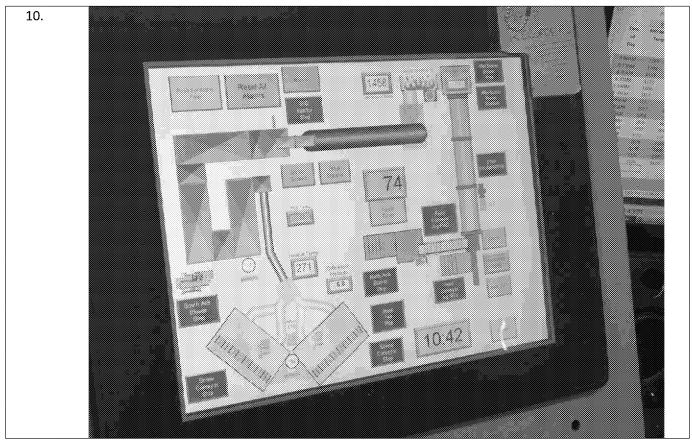


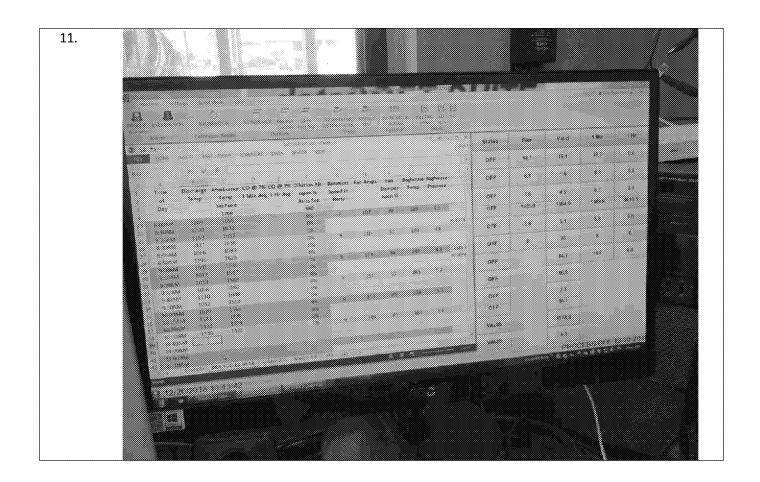












VISIBLE EMISSION OBSERVATION	FORM	Form Num	ıber			Page	Of			
Method Used Method 9		Continued	on VEO Fo	orm Numbei		***************************************		ПТ		
Equipment Owner		Observation	n Date	Time	Zone		Start Time	End Ti	ime	\dashv
Gary Kippur Facility Name		12/20/2	2018	MS	T		10:35:47	10:4	3:02	
Tucson Iron & Metal							Comments			
EO Street Address	RANGO RANGO CARAGO CARAGO RA	1	N/A	N/A	N/A	N/A				
4484 E Tennessee St EO City EO State EO Zip		2	N/A	45	10	15				
Tucson AZ 8571	4	3	25	20	20	5	Avg. Opacit	y = 23.5	542	
Process Unit Operating	g Mode	1 4	5	10	10	15				
OSWI N/A N/A Control Equipment Operating	n Modo	5	20	20	15	35	1			
Baghouse Stand		6	35	15	35	30				_
Describe Emission Point		7	45	55	40	15			***************************************	
Cylindrical Refractory Incinerator		8	25	N/A		 	_	***************************************	***************************************	
Height of Emiss. Pt. Height of Emiss. Pt. Rel. to Ol Start 13.37 End Same Start 9.37 End Sar		9	25	IN/A			<u> </u>			
Distance to Emiss. Pt. Direction to Emiss. Pt. (Degre	es)	10				 		***********************	***************************************	
Start 101.44 End Same Start 326.27 End Sar	ne	,	ļ	-		 				
Vertical Angle to Obs. Pt. Start 4.71 End Same Direction to Obs. Pt. Start 330.17 End Same	me	11				ļ		*****************		
Distance and Direction to Observation Point from Emission Point	000000000000000000000000000000000000000	12	ļ							
Start 7.81 / 18.11 End Same		13								
Describe Emissions Start Black Smoke End Same		14								
Emission Color Water Droplet Plume	1/4 · / 🗸)	15								
Start Black End Same Attached: () Detached: () N	I/A. (\	16								
Describe Plume Background Start Blue sky End Same		17								
Background Color Sky Conditions		18		-				***************************************	***************************************	
Start Blue End Same Start Clear End Sar Wind Speed Wind Direction	116	19								
Start 6 End Same Start 110 End 90 Ambient Temp. Wet Bulb Temp. RH Percent	100000000000000000000000000000000000000	20	T	<u> </u>	<u> </u>					
	End Same	21	†			 				
		22								
		23	 		ļ					
		24				-				
		25	-							
		26	 			 				
100		27	ļ			ļ			***************************************	***********
		28	ļ	ļ		ļ		***************************************		
		29								
		30								
		31								
		32								
			Name (Pri							
· ·			Fitzpat	rick						
Longitude Latitude Declination		Observers Signature Date Dustin Fitzpatrick 12/20/2018								
110.53.47.458 W 32.09.52.895 N		Organization								
Notes		PCDE(*******************************	***********************	D-4:	000000000000000000000000000000000000000			
		Certified B	y Fitzpat	rick		Date 12/2	20/2018			

Source

Name: Other Solid Waste Incinerator

Address: 4484 E Tennessee St

City: Tucson State: AZ Zip: 85714 Phone: 5207481900

Local ID:

Regulatory

Permit ID: 127 Condition: Regulatory Reference:

Process

Process: OSWI Unit: N/A Operating Mode: N/A

Complaint

Name: Address: City: State: NA Zip:

Equipment

Name: Incinerator

Type of Inspection

Type of Inspection: Surveillance

Sun

Altitude: 28.9 Azimuth: 152.1 Data Source: Calculated

Map Information

Map Type: USGSDRG Map Width: 502

Analysis

Averaging Type: Automatic

Method: Method 9

Number of Images: 24 Rolling High Count: 24 Seconds Between Images: 15

Who Created: DOCS II Creation Date: 9/22/2011 Analyst Name: Shawn Dolan

Affiliation: Virtual Technology LLC 05

Comments:

Image	Opacity	Coordinates	Date Taken	Camera Information
IMG_0988.JPG	45	Foreground Coordinates T	•	
IMG_0989.JPG	10	Foreground Coordinates T	•	
IMG_0990.JPG	15	Foreground Coordinates T		
IMG_0991.JPG	25	Foreground Coordinates T		
IMG_0992.JPG	20	Foreground Coordinates T	•	
IMG_0993.JPG	20	Foreground Coordinates T	•	
IMG_0994.JPG	5	T	'	
IMG_0995.JPG	5	Foreground Coordinates T	· ·	

Image	Opacity	Coordinates	Date Taken	Camera Information
IMG_0996.JPG	10	Foreground Coordinates T	•	
IMG_0997.JPG	10	Foreground Coordinates T L B R 844 952 883 986 Background Coordinates T L B R 779 662 817 696	•	
IMG_0998.JPG	15	Foreground Coordinates T	'	
IMG_0999.JPG	20	Foreground Coordinates T	•	
IMG_1000.JPG	20	T	•	
IMG_1001.JPG	15	Foreground Coordinates T L B R 782 921 821 955 Background Coordinates T L B R 844 685 882 719	•	
IMG_1002.JPG	35	Foreground Coordinates T	'	
IMG_1003.JPG	35	Foreground Coordinates T	· ·	

Image	Opacity	Coordinates	Date Taken	Camera Information
IMG_1004.JPG	15	Foreground Coordinates	•	
IMG_1005.JPG	35	779 662 817 696	•	
IMG_1006.JPG	30	T	1	
IMG_1007.JPG	45	Foreground Coordinates	1	
IMG_1008.JPG	55	Foreground Coordinates T	•	
IMG_1009.JPG	40	Foreground Coordinates T	•	
IMG_1010.JPG	15	Foreground Coordinates T	•	
IMG_1011.JPG	25	Foreground Coordinates T	· ·	

SOURCE TEST REPORT COMPLIANCE/RATA CONTRABAND INCINERATION SYSTEM

Pima County Department of Environmental Quality (PDEQ)
Permit # 127 (Draft proposal)

Test Dates: July 24-25, 2018

Prepared for:



4484 East Tennessee Street Tucson, Arizona 85714

Prepared by:



Bison Engineering, Inc. 3865 E. 34th St., Ste. 105 Tucson, Arizona 85713 www.bison-eng.com

> Report Date: September 19, 2018

EXECUTIVE SUMMARY

Bison Engineering, Inc. performed source testing on the Contraband Incineration System located at the Tucson Iron & Metal facility in Tucson, Arizona. The following table summarizes the averaged results of the test runs during this project.

Table 1: Executive Summary of Tucson Iron & Metal Compliance Results

PARAMETER	LIMITS	UNITS	RESULTS	PASS/FAIL
Sulfuric Dioxide (SO ₂) (M6)	3.1	ppmvd @ 7% O ₂	20.5	Fail
Nitric Oxide (NO _x) (M7)	103	ppmvd @ 7% O ₂	72.83	Pass
Carbon Monoxide (CO) (M10)	40	ppmvd @ 7% O ₂	16.91	Pass
Dioxin/Furans (M23)	33	ng/dscm @ 7% O ₂	0.212	Pass
Hydrogen Chloride (HCI) (M26A)	15	ppmdv @ 7% O ₂	1.42	Pass
Particulate Matter (M5)	0.013	gr/dscf @ 7 % O ₂	0.012	Pass
Cadmium (Cd) (M29)	18	μg/dscm @ 7% O ₂	12.9	Pass
Lead (Ld) (M29)	226	μg/dscm @ 7% O ₂	92.2	Pass
Mercury (Hg) (M29)	74	µg/dscm @ 7% O ₂	24.18	Pass

Table 2: Executive Summary of Tucson Iron & Metal RATA Results

PARAMETER	LIMITS	UNITS	RESULTS	PASS/FAIL
Oxygen (O ₂) (M3A)	1%	ABS	0.194	Pass
Carbon Monoxide (CO) @ 7% O ₂ (M10)	40	ppmvd @ 7% O ₂	3.3	Pass

DAILY OPERATORS LOG FOR INCINERATOR <u>www.ck</u>i OPERATOR FULL NAME: DATE: DAILY INSPECTION REPORT MISC. DUCTWORK MOTORS/ BEARINGS REFRACTORY BAGS BAGHOUSE BURN TYPE -**DEFICIENCIES BEARINGS** REPAIRED **ROTARY OR** INSPECTED INSPECTED INSPECTED INSPECTED NOTED (RECORDED OR BATCH ON REPAIR REPORT) YES) GREASED NO YES NO YES NO REPLACED (CIRCLE ONE) YES) NO YES NO REPAIRS NO REPAIRS REPAIRS YES YES NO REPAIRS 8 VISIBLE EMISSIONS NO YES NO YES YES NO NO YES. CHECKED (AT LEAST 2 TIMES MAGNAHELIC CALCULATED INITIAL DURING BURNI TOTAL TIME TYPE OF TIME READINGS 2nd 4 787 A (START TIME IS MAGNAHELIC DAILY FEED WEIGHT OF CHECKED HQURS COINCIDENT WITH HOURS (AT LEAST 2 TIMES MATERIAL READING NO /YES) NO RATE YES) **OPERATION** MATERIAL INSPECTION) 1874 2nd 4 **EMISSIONS** 1015 169 CIRCLE Start Shut-.HOURS HOURS PRESENT 8460 ALL THAT Per 1/K 8433 YES DNO YES! NO down 4001V Time **REPAIRS** MARIJUANA CORRECTIVE ACTION ENTERED 4:40 NO YES ON MALFUNCTION REPORT 18:20 COCAINE born. Looks like duct work my hove failed. will inspect duct work when system dools **EMISSIONS FUGITIVE** METHAM-PRESENT **EMISSIONS** PHETAMINE 18T 4 2nd 4 WOOD CHECKED (AT LEAST 2 TIMES PAPER DURING BURNI BURLAP/ **18T 4** 2nd 4 IF YES FARRIC dæin. HOURS HOURS CORRECTIVE ACTION ENTERED ON ASSOCIATED YES NO YES NO MALPUNCTION REPORT WRAPPING

- A.

ED_005878_00000224-00083

DAILY OPERATORS LOG FOR INCINERATOR **OPERATOR FULL NAME:** 12/14/18 Dustall usola! DATE: DAILY INSPECTION REPORT DUCTWORK MISC. REFRACTORY MOTOR8/ **BEARINGS** BAGS BAGHOUSE BURN TYPE -**DEFICIENCIES** BEARINGS REPAIRED ROTARY OR INSPECTED INSPECTED INSPECTED NOTED (RECORDED MSPECTED OR BATCH GREASED ON REPAIR REPORT REPLACED VES. NO YES NO YES NO (CIRCLE ONE) YES) NO YES NØ **REPAIRS** REPAIRS NO) REPAIRS YES NO. REPAIRS YES R) R VISIBLE EMISSIONS YES NO. YES/ NO. NO. YES NO YES CHECKED (AT LEAST 2 TIMES MAGNAHELIC CALCULATED INITIAL TOTAL TIME TYPE OF DURING BURN) TIME READINGS 2nd 4 78**Y**A (START TIME IS MAGNAHELIC DAILY FEED OF WEIGHT CHECKED COINCIDENT WITH HOURS HOURS (AT LEAST 2 TIMES MATERIAL TYES IT NOT YES NO READING RATE OPERATION MATERIAL NURINA BURNI INSPECTION) 1273 (65 18T 4 2nd 4 **EMISSIONS** CIRCLE Shut-Start HOURS **HOURS** PRESENT 7220 3. Z ALL THAT 5,67 down Per HIZ YES NO YES! NO NO VEN NO Time **XDDIX** Thea REPAIRS IF YES MARIJUANÀ 3,2 CORRECTIVE ACTION ENTERED YES 2:10 ON MALPUNCTION REPORT 18130 COCAINE CEM not Available due to **EMISSIONS FUGITIVE** METHAMcalibration? Power Carlure 1.50ble emissions, will inspect ductork when system asks PRESENT PHETAMNE **EMISSIONS** MOOD CHECKED 1814 2nd 4 (AT LEAST 2 TIMES HOURS HOURS PAPER DURING BURNI YES NO BURLAP/ 2nd 4 18T.4 IF YES FABRIC HOURS. **HOURS** ASSOCIATED CORRECTIVE ACTION ENTERED ON Yes DNO YESD NO **WALFUNCTION REPORT** WRAPPING

ED_005878_00000224-00084

,c	D	AILY)PE	: <	\TO	RS	LOGF	OR	,/2 y	***************************************)R		
DATE:	124	<u> </u>	OPER	NTOR F	ULL NA	***************************************			************		3			
***************************************		***************************************			· D	AIL'	/ INSPEC	TIO!	NRE	POKI				
	***************************************			<u> </u>	REFRAC		DUCTWORK	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	TOR8/	BEAF	UNG8	MISC.		
BURN		BAGHOUSE		URED :	l			BEARINGS				DEFICIENCIE8		
ROTAL		INSPECTED		R	INSPE	CTED	JNSPECTED	/1Ñ8P	ECTED				RECORDED	
BAT			REPL		(YES)	NO	YE8 NO	YES	NO	ORE	48ED	ON REPAI	REPORT!	
CIRCL	EONE) B	(YES) NO REPAIRS	YES	NO	REP/	UR8	REPAIRS	REF	AIRS	(YEB)	NO	YES		
	8,39					A		YES	1/NO/			VIBIBLEE	*	
		YES (NO)			YES (NO)	YES NO	YCO	L. **/_				KED	
										208 20 2 3 5 5 5 5 7 5 7		(AT LEAST 2 TIMES		
	00000000000000000000000000000000000000	TYPEOF	TOTAL	TIME			CALCULATED	INITIAL		MAGNAHELIC		DURING BURNI		
TIR (START	AC ************************************	8 8 8 90 907		<u> </u>		DAILY FEED	MAGNAHELIC		CHECKED		1814	2004		
COINCID	INT WITH		C	F	AACI	arı i	Paratra 1 1 mmm			(AT LEAS		HOURS	HOURS VEST HO	
MATE	inial.	MATERIAL	OPER	ATION			RATE	READING					8008	
Mape		CROLE		~~~~~~~~~~			7272164			18T4 HOURS	HOURS			
Start	Shut- down	ALL THAT	Z.	6	3,/	80	PerHP	4,	<u></u>	7/88/ NO	YEQ NO	YES WO	YEST (NO.)	
Time	Tlema	ABBLY				***************************************			AIR8		. 2	IF Y	/E8	
		(MARUUVIA)						YES	T NO	4. 2	4.6	CORRECTIVE AC		
2,30	6:00	COCAINE		\$~~~~~	OCCUPATION AND A STATE OF THE S		EMISSIC	aig	**************************************				Cooling	
	***************************************	DETHAM:		{	FUGITIVI			i.a. .11.8.23	(446)	artec i	evucz o		coolida	
		PHETAMINE			MISSION		PRESEA	<u> </u>	1 12/15	and h	cond s	y nave i	13	
		WOOD	CHECKED				1 1	2nd 4	1	. Za/	, ared	grave in		
		PAPER		· ^	LEAST 2 TI				1700	" mi	2/17. R	goirs Cc	white I	
		BURLAPI		§,,,,,,,,	MING BU	<u>(N)</u> nd 4	YES (NO.) Y) www	fund man.	, \$.46		
		PARKIC		18	* }	ura ura								
		ASSOCIATES	 (*)		NO (VE		MALPUNCTION R							
l .		WRAPPING/	I						20077777					

		AILY)PER/	YTORS	LOG	FORING	INE	RAT()R	
DATE:	12/0	<u>8/20</u>	OPERATOR	ULL NAME:		7340	106E	2		
			***************************************	DAIL'	Y INSPE	TION RE	PORT			
BURN	TYPE.	BAGHOUSE	BAGS	REFRACTORY	DUCTWORK	MOTOR8/	BEA	RINGS	1	8C.
ROTAF		INSPECTED	REPAIRED	INSPECTED	INSPECTED	BEARINGS			1	ENCIES
BAT	- 23		OR	YED NO	YES NO	MBPECTED (YES NO	l ope	ASED	§	RECORDED R REPORT)
CIRCLE	eone)(YES/ NO	REPLACED				\$ 0.07 \$ 0.000			r
(R)	8	REPAIR8	YES (NO)	REPAIRS	REPAIRS	REPAIRS	YES	(110)	YES	
		YES / NO		YES /NO	YES NO	TYES / NO)		***************************************	1	MISSIONS
										KED
	883	TYPEOF	TOTAL TIME		CALCULATED	INITIAL.	WAGNAHELIC		(AT LEAST 2 TIMES DURING BURN)	
MIT (TARTS)		3 8 8 8 m W 1		* ** ***** *** * ****	DAILY FEED	MAGNAHELIC		MINGS	7877	2004
COINCIDE	NT WITH		OF	WEIGHT	UMILI TEED	1864/23841182614	}	CKED T21ME8	HOURS	HOURS
MATEI INSPEC		MATERIAL	OPERATION		RATE	READING	1874 2nd 4		(YES) NO (YES) NO EMISSIONS	
Start	Shut-	CIRCLE			1273149	7	- HOURS	HOURS	_ EMIS _ PRE	
Time	down	ALL THAT	6.5	8,250	Per HR		(VEB) NO	(YEST NO	(~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	MED NO
	Zima	(MARIJUANA)			•	REPAIRS	, ,	27a 1	OORRECTIVE AS	
4:00	7'3°	COCAINE				YES (NO	6.1	4.4	ON MALFUNG	
		METHAN-	i	FUGITIVE	EMISSIC	NS	,			
		PHETAMINE		MISSIONS	PRESEN	7				
		NOOD	C	HECKED		tnd 4				
		PAPER		EAST 2 TIMES						
		BURLAP/	187	RING BURNI 4 2nd 4				.0		1
	ار	- FABRIO - ABBOCIATED	HOU		CORRECTIVE ACTION B	NTERED ON				
	$ \langle 1 \rangle$	WHAPPING	/YE8)	NO/YES NO	MALFUNCTION RE					

DAILY OPERATORS LOG FOR INCINERATOR 12/20/18 **OPERATOR FULL NAME:** DATE: DAILY INSPECTION REPORT DUCTWORK MOTORS/ BEARINGS MISC. BAGS REFRACTORY RAGHOUSE BURN TYPE -**DEFICIENCIES BEARINGS** REPAIRED **ROTARY OR** INSPECTED INSPECTED INSPECTED **INSPECTED** NOTED (RECORDED OR BATCH YES YES ON REPAIR REPORT) NO YES) NO GREASED REPLACED NO (CIRCLE ONE) NO YES! YES NO **REPAIRS** REPAIRS YES NO REPAIRS REPAIRS 8 YES NO VISIBLE EMISSIONS YES NO NO NO YES NO YES YES CHECKED **JAT LEAST 2 TIMES** CALCULATED INITIAL MAGNAHELIC TOTAL TIME TYPE OF **DURING BURNI** TIME READINGS (START TIME IS 7877 2nd 4 MAGNAHELIC DAILY FEED OF WEIGHT COINCIDENT WITH CHECKED HOURS HOURS MATERIAL (AT LEAST 2 TIMES NO (YES) RATE READING NO YES. **OPERATION** MATERIAL NURINA BURNI INSPECTION 2nd 4 **EMISSIONS** 187 4 1410165 CIRCLE Shut-Start HOURS HOURS PRESENT 2.6 0,340 **ALL THAT** down 7.33 'Au UR YES NO YES NO NO (YES) NO Time ADDLY **REPAIRS** (MARIJUANA) CORRECTIVE ACTION ENTERED YES 7:40 3:00 COCAINE ON MALFUNCTION REPORT slight emisson moable today
Possible leak in bag house.
will respect and repair kessere
west born on 1/1/19 **EMISSIONS** METHAM-**FUGITIVE** PHETAMINE **EMISSIONS** PRESENT COOW 1ST 4 CHECKED 2nd 4 PAPER (AT LEAST 2 TIMES HOURS MOURS **BURLAP**/ **DURING BURN)** YES | (NO/ **1ST 4** 2nd 4 FABRIC' IF YES HOURS HOURS ASSOCIATED CORRECTIVE ACTION ENTERED ON NO YES NO wrapping /YES MALFUNCTION REPORT

COMPANY: AMCEP
LOCATION: Tecsor AZ.
SOURCE: Contraband incinerator
CEMS ID: 1234567
DATE CREATED: 12/14/2018 89 14:23

PERIOD.

12/14/2018 00:00 - 12/14/2018 23:00

gate	PROCESS CODE	SCHURE CRI CRIMOS	089 02 (%)	D819 (2) (8934)	(0) (%)	CC) 89 7% (PPSS)	AFTERBUBAKA TEMPERATURE (DEG 8)	DUST COLLECTOR OF UN HZO)	DRY G2 12-HOUR ROUL AVG (%)	Day CO 12-HOUR ROLL AVG (PPNA)	CD BY TS 12 HOUR BOLL BUC (PPSS)	AFTERBURNER TEMPERATURE 3-HOUR ROLL AVG (DED F)	DUST COLLECTOR EMOUR ROLL AVG (IN HZO)	DAS DOWN (MINS)
12/14/2018 00:00	1 4		OFF	OFF	OFF	OFF	OFF	OFF	38.9	3.6	23.6	OFF	OFF	3
12/14/2018 01:00	***************************************		OFF	GFF	355	OFF	OFF	OFF	18.9	3.5	72.7	OFF	OFF	3
12/14/2018 02:00	4	T 8	OFF	OFF	OFF	GFF	OFF	OFF	18.9	2.8	18.7	OEE	088	
12/14/2018 03:00	4	1 8	OFF	OFF	OFF	OFF	CEFE	OFF	18.0	8.1	0.8	OFF.	OFF	
12/14/2018 04:00	4	3	OFF	QFF	OFF	OFF	SPE	OFF	25.1	0.0	0.2	OFF	OFF	
12/14/2018 05:00	4	8	- OFF	QH	OFF	OFF	OFF	OFF	OFF	OFF	OH	OFF	OFF	<u> </u>
12/14/2018 06:00	\$	8	088	OFF	OFF	OFF	OFF	ON	OFF	OFF	CFF	OFF.	OFF	<u> </u>
12/14/2019 07:00	*************************	i i	OFF	Off	Off	OFF	OFF	OFF	OFF	OFF	CEF	OFF	OFF	
12/14/2018 08:00	4	23	OFF	OFF	OFF	088	1435.6	3.0	OFF	OFF	OFF	1435,6	3.0	
12/34/2038-09:00	4	0	OFF.	OFF	OFF	344	OFF	OFF	OFE	OFF	OFF	1435.6	3.0	
12/14/2018 10:00	g g	0	DAS/PLC	DAS/PLC	BAS/PLC	OFF	DAS/PLC	DAS/PLC	OFF	OFF	OFF	1/135.6	3.0	50
12/14/2018 11:00	9	0	DAS/PLC	DAS/PLC	DAS/PLC	OFF	DAS/PLC	DAS/PLC	OFF	OFF	OFF	DAS/PLC	DAS/PLC	50
12/14/7018 12:00	2	Ø	DAS/83.0	DAS/PLC	DAS/PLC	Oss	DAS/PEC	DAS/PLC	OF#	OFF	l off	DAS/PLC	DAS/PLC	60
12/14/2018 13:00	3	Ø	DAS/PLC	DAS/PLC	DAS/PLC	OFF	BAS/PLC	DAS/PEC	OFF	OFF	DFF.	OAS/PLC	DAS/PEC	<u> </u>
12/14/2018 14:00	NO	DATA	FOUND			1				<u></u>				<u> </u>
12/14/2018 15:00	NO	DATA	POUND					<u> </u>	<u> </u>					
12/14/2018 16:00	NO	DATA	FOUND											
12/14/2018 17:00	80	DATA	FOUND							<u>.</u>				
12/14/2018 18:00	100	DATA	FOUND											
12/14/2018 19:00	NO	DATA	FOUND			<u> </u>	<u></u>	<u> </u>	<u> </u>					-
12/14/2018 28:00	NO	BATA	FOUND				<u></u>			<u> </u>				4
12/14/2018 21:00	NO.	DATA	FOUND				<u> </u>		ļ					
12/14/2018 22:00	NO.	DATA	FOUND						ļ		ļ		Ļ	. j
32/14/2018 23:00	80	DATA	FOUND	1	1	1		1	<u> </u>		<u> </u>	<u>. L</u>	.i	

	PROCESS CODE	SOURCE ON (HRS)	D87 O2 (%)	OKY CO (PPM)	coz (%)	CO 8 74 (1994)	afterbunner Temptrature (Deg F)	BUST COLLECTOR DP (N H2O)	DRY G2 12-ROUR ROU AVG (%)	DRY TO 12-HOUS MOLL AVG (PPM)	(0) # 75 12-HOUR 80U AVG [PPM]	AUTERBURNER TEMPERATURE 3-PCUR ROLL AVG (DEG F)	DUST COLLECTOR DP S-HOUR ROLL AVG (M HZO)	oas Down (HRS)
AVERAGE	·		***************************************	***************************************	*****************	***************************************	1435.5	3.8	13.8	2.3	13.3	1435.6	3.0	
TOTAL	***************************************	0.38		***************************************									<u> </u>	4.17
MIN VALUE	·	1	<u></u>	(m	***************************************	T	1435.6	3.0	18.9	0.8	0.3	1435.5	3.0	
NIN TIME	***************************************	***************************************	***************************************		•	***************************************	65:00	08:00	88:99	94:90	04:00	98:63	98:00	
	·	 		<u> </u>	***************************************	· j · · · · · · · · · · · · · · · · · ·	12/19/2018	12/14/2018	12/14/2018	13/14/2018	12/14/2018	12/14/2018	12/14/2018	<u> </u>
MIN OATE	·••	 	<u> </u>		·}	·•	1435.6	3.0	19.1	3.5	23.6	1435.6	3,0	}
MAK VALUE			ļ	÷		- 	08:50	08:00	04:00	00:00	80:00	19:66	10:00	
MAX TIME MAX DATE		 				·	12/14/2018	12/14/2018	12/10/2018	12/14/2018	12/14/2018	17/14/2018	12/14/2018	

ROLLING AVG EMISSIONS REPORT

COMPANY:

AMCEP

LOCATION: SOURCE: Tucson AZ.
Contraband Incinerator

CEMS ID:

1234567

-8188813 883 s

DATE CREATED: 12/14/2018 @ 14:24

PERIOD:

12/14/2018 00:00 - 12/14/2018 23:00

DATE	SOURCE ON (MINS)	AFTERBURNER TEMPERATURE 3-HOUR ROLL AVG (DEG F)	DUST COLLECTOR DP 3-HOUR ROLL AVG (IN H2D)	DRY O2 12-HOUR ROLL AVG (%)	DRY CO 12-HOUR ROLL AVG (PPM)	CO Ø 7% 12-HOUR ROU AVG (PPM)	CO @ 7% 12-HOUR ROLL AVG LIMIT (PPMI)	CO @ 7% (PPM)	DAS DOWN (MINS)
12/14/2018 00:00	0	OFF	OFF	18.9	3.6	23.6	40.0	OFF	0.
12/14/2018 01:00		OFF	OFF	18.9	3.5		40.0	OFF	0
12/14/2018 02:00	0	OFF	OFF	18.9	2.8	18.2	40.0	OFF	0
12/14/2018 03:00	0	OFF	OFF	19.0	0.1	0.8	40.0	OFF	0
12/14/2018 04:00	0	OFF	OFF	19.1	0.0	0.2	40.0	OFF	0
12/14/2018 05:00	0	OFF	OFF	OFF	OFF	OFF	40.0	OFF	0
12/14/2018 06:00	0	OFF	OFF	OFF	OFF	OFF	40.0	OFF	0
12/14/2018 07:00	0	OFF	OFF	OFF	OFF	OFF	40.0	OFF	0
12/14/2018 08:00	23	1435.6	3.0	OFF	OFF	OFF	40.0	OFF	2
12/14/2018 09:00	0	1435.6	3.0	OFF	OFF	OFF	40.0	OFF	8
12/14/2018 10:00	0	1435.6	3.0	OFF	OFF	OFF	40.0	OFF	60
12/14/2018 11:00	0	DAS/PLC	DAS/PLC	OFF	OFF	OFF	40.0	OFF	60
12/14/2018 12:00	0	DAS/PLC	DAS/PLC	OFF	OFF	OFF	40.0	OFF	60
12/14/2018 13:00	0	DAS/PLC	DAS/PLC	OFF	OFF	OFF	40.0	OFF	60
12/14/2018 14:00	NO	DATA	FOUND						******************************
12/14/2018 15:00	NO	DATA	FOUND						
12/14/2018 16:00	NO	DATA	FOUND						
12/14/2018 17:00	NO	DATA	FOUND						
12/14/2018 18:00	NO	DATA	FOUND						
12/14/2018 19:00	NO	DATA	FOUND						
12/14/2018 20:00	NO	DATA	FOUND						ļ
12/14/2018 21:00	NO	DATA	FOUND						
12/14/2018 22:00	NO	DATA	FOUND						***************************************
12/14/2018 23:00	NO	DATA	FOUND						

	SOURCE ON (HRS)	AFTERBURNER TEMPERATURE 3-HOUR ROLL AVG (DEG F)	DUST COLLECTON DP 3-HOUR ROLL AVG (IN HZO)	DRY OZ 12-HOUR ROLL AVG (%)	DRY CO 12-HOUR ROLL AVG (PPM)	CO @ 7% 12-HOUR ROLL AVG (PPM)	CO ® 7% 12-HOUR ROLL AVG UMIT (PPM)	CO @ 7% (PPM)	DAS DOWN (HRS)
AVERAGE		1435.6	3.0	19.0	2.0	13.1	40.0		
TOTAL	0.38								4.17
MIN VALUE		1435.6	3.0	18.9	0.0	0.2	40.0		
MIN TIME		08:00	08:00	00:00	04:00	04:00	00:00		
MIN DATE		12/14/2018	12/14/2018	12/14/2018	12/14/2018	12/14/2018	12/14/2018		
MAX VALUE	***************************************	1435.6	3.0	19.1	3,6	23.6	40.0		
MAX TIME		10:00	10:00	04:00	00:00	00:00	13:00		
MAX DATE	***************************************	12/14/2018	12/14/2018	12/14/2018	12/14/2018	12/14/2018	12/14/2018	<u> </u>	<u> </u>